



**RISK & SAFETY PLUS**  
The science of compliance

# **SAFETY, HEALTH, ENVIRONMENTAL AND FIRE (SHEF)**

## **Policy, responsibilities and procedures**





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#### **RECORD OF AMENDMENTS AND REVISIONS**

<b>Section</b>	<b>Details</b>	<b>Inserted by</b>	<b>Date</b>
All	Complete re-write (previous versions archived)	Malcolm Tullett	10 Feb 2016





## INTRODUCTION

The following 3 pieces of legislation are the primary 'Statutory Provisions' relating to the management of risk, for Companies in England and Wales:

- ❖ **The Health and Safety at Work etc. Act (HASAWA) 1974** covers virtually all classes of person whose health, safety and / or welfare is affected by any workplace activity. The Health and Safety Executive (HSE) has a statutory duty to enforce the Act, in higher risk sectors (e.g. construction, offshore etc.), whereas the Local Authority (LA) Environmental Health Office(r) (EHO) undertakes enforcement duties, in the lower risk sectors (e.g. retail, commerce etc.).
- ❖ **The Environmental Protection Act (EPA) 1990** made provision for the improved control of pollution, from land, water and air, arising from certain industrial and other processes, which were previously enforced under separate pieces of legislation. The Environment Agency (EA) enforces the major polluting sectors and the LA EHO enforces elsewhere.
- ❖ **The Regulatory Reform (Fire Safety) Order (FSO) 2005** consolidated nearly all fire legislation, prior to the Order and removed the need for fire certification; replacing it with a focus on requiring the 'Responsible Person' to conduct a 'more dynamic' Fire Risk Assessment (FRA), to better reflect risk control needs. The HSE maintain enforcement control of process fire precautions (PFP), although the LA Fire and Rescue Authority (F&RA) enforce general fire precautions (GFP), which applies to the majority of workplaces.

Further information about the legislation, associated Regulations, Approved Codes of Practice and Guidance is provided in a separate SHEF Manual, which should be read in conjunction with this document.

However, the preparation and publication of this Policy signifies the commitment of **Risk and Safety Plus Limited**, henceforth referred to as "*the Company*", to the safety and wellbeing of our staff and contractors, in addition to all / any other '*relevant persons*' that may be affected by our activities and our intention to comply with the requirements of the Acts, Regulations, associated codes and good practice guidance.

The document is formatted in three sections, being the '*Policy Statement(s)*' referred to above, the '*Organisational Structure*' needed to implement the policy requirements and the '*Arrangements*', where policy goals are implemented, as a Safe System of Work (SSoW) or Environmental Protection Measure (EPM).

To ensure that the Policy and its objectives, together with the associated procedures, are clearly identified and accepted by all members of staff, a copy of the latest SHEF Policy Statement(s) will be sited, in prominent positions, for all staff and visitors to see.

Furthermore, the policy will be distributed, in full, to all persons with direct responsibilities and duties specified in the policy, including the Director with overall responsibility for SHEF management. Upon being recruited into the Company, members of staff and any contractors will also be provided with direct input, in relation to their specific SHEF responsibilities, at a formal induction session.

Amendments are to be inserted in the appropriate position(s), within the document and the original page(s) removed and archived. A table is available so that a record can be made each time an update is made, which normally follows legislative changes and / or the regular review processes.

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## GENERAL STATEMENT OF POLICY ON HEALTH AND SAFETY MANAGEMENT

### Our commitment to health and safety, including fire safety

It is of primary importance to **Risk and Safety Plus Limited**, henceforth referred to as "the Company", to carry out our operations in such a way as to avoid harm to our staff, contractors, clients and / or others who may be affected, directly or indirectly, by our activities, whilst they are on or around our premises, or on any sites under our control.

Safe working practices and staff wellbeing are vital to the overall efficiency and success of the Company and accordingly, Health and Safety has equal status with all of our operational objectives, which are, therefore, everyone's responsibility. Consequently, safety forms an integral part of the duties of all staff, particularly as we are committed to securing the highest achievable standards, while complying with all of the relevant statutory provisions.

### Aims

- ❑ To conform to the minimum requirements, at least, of the Health and Safety at Work Act, the Regulatory Reform (Fire Safety) Order and all relevant associated Regulations and Codes of Practice.
- ❑ To provide a safe and healthy working environment for all staff and visitors.
- ❑ To eliminate the use of products and practices that could have an adverse effect on people, premises, plant and / or equipment.
- ❑ To strive for the continuous improvement of workplace safety.

### Objectives

- ❑ To establish and maintain effective systems and plans for managing the health, safety and welfare of all staff and others.
- ❑ To ensure that *all* 'significant' risks are properly assessed and controlled.
- ❑ To establish and maintain clear written standards and procedures to control the risk to health and safety, as well as ensuring that the procedures are enforced.
- ❑ To ensure that all staff and contractors are 'competent' to perform the task(s) required of them safely, through the provision of adequate information, instruction, training and supervision.
- ❑ To maintain an effective system of consultation with our staff and contractors on health and safety issues.
- ❑ To ensure that all accidents and incidents are properly reported, investigated and appropriate corrective actions are taken, to prevent any reoccurrence.
- ❑ To promote an increased awareness of safety and wellbeing.
- ❑ To maintain an effective system of monitoring and reviewing health and safety performance.

This policy and any associated procedures will be regularly reviewed and up-dated, to reflect changes in legislative, operational and management arrangements but in any case, every 12 months.

Signed:

.....  
Lesley Dale (Operations Director)

**Director responsible for SHEF compliance**

Date:

.....  
10 February 2016

**IMPORTANT NOTE:** Members of staff and Contractors working for us may be required to visit and / or work at premises that are not under our control, either directly or indirectly and in those circumstances, all staff are required and expected to acquaint themselves with the SHEF procedures applicable to the premises visited and / or at which they work.

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## GENERAL STATEMENT OF POLICY ON ENVIRONMENTAL MANAGEMENT

### Our commitment to the environment

**Risk and Safety Plus Limited** recognises that effective environmental management makes good operational sense and will become a fundamental and integral part of our strategic decision-making processes.

We are committed to ensuring that our own operations and any related activities, over which we exert an influence, take account of and utilise techniques and materials designed so as not to harm the environment.

In recognising the importance of achieving these high standards, the procedures necessary to protect the environment, will need to ensure that we:

- ▣ are aware of how our activities impact upon the environment, particularly in relation to the:
  - ▣ choice of materials, best suited for a particular use, which will take account of sustainability, especially if scarce and / or non-renewable
  - ▣ reduction in air, land and water pollution
  - ▣ avoidance and / or minimisation of waste, through re-use, recycling and appropriate waste management
- ▣ comply with our statutory responsibilities, at the very least, by:
  - ▣ always seeking to minimise any adverse effects, by adopting the Best Available Technique(s) Not Entailing Excessive Cost (BATNEEC);
  - ▣ adopting, if and when appropriate and necessary, the Best Available Technique(s) (BAT), regardless of cost;
- ▣ are sensitive to the environmental concerns of our neighbours and the communities through which we operate;
- ▣ require our suppliers and contractors, where relevant at procurement, to have a proper regard for this Environmental Protection Policy, in relation to the goods and services they provide;
- ▣ communicate this policy to our staff, contractors and suppliers, as well as any other interested parties, upon request, in order to seek their help in its implementation;
- ▣ seek to continually improve, in relation to both organisational and site management, as well as the acquisition and use of equipment

This policy and any associated procedures will be regularly reviewed and up-dated, to reflect changes in legislative, operational and management arrangements but in any case, every 12 months.

Signed:

.....  
Lesley Dale (Operations Director)

**Director responsible for SHEF compliance**

Date:

.....  
10 February 2016

**IMPORTANT NOTE:** *Members of staff and Contractors working for us may be required to visit and / or work at premises that are not under our control, either directly or indirectly and in those circumstances, all staff are required and expected to acquaint themselves with the SHEF procedures applicable to the premises visited and / or at which they work.*

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## ORGANISATIONAL RESPONSIBILITIES FOR SHEF

### ORGANISATIONAL STRUCTURE

The responsibilities for SHEF in the Company are shown in the organogram below:



### DIRECTOR RESPONSIBLE FOR SHEF COMPLIANCE, ON BEHALF OF THE BOARD

In addition to the general responsibilities placed upon all staff members, the appointed Director will undertake the following additional duties:

- 📦 Formally undertake the role of 'Responsible Person', as required by the current 'relevant statutory provision(s)' and liaise with the Board of Directors to keep them apprised of SHEF performance and strategic SHEF developments.
- 📦 Ensure that the Company operates in accordance with the requirements of the current 'relevant statutory provisions' and good SHEF practice (e.g. sustainable environmental practices, in relation to land, water and air pollution and waste minimisation).
- 📦 Ensure sufficient resources (i.e. funds, staff, materials and time etc.) are made available, to eliminate or reduce, so far as is reasonably practicable, any 'significant' risk, to persons, premises, plant and equipment or the environment, as may be identified by a risk assessment or hazard report.
- 📦 Ensure that all accidents, incidents and 'near miss' occurrences are reported, internally and investigated appropriately, where necessary, to ensure that remedial action is taken, to prevent a reoccurrence. In addition, where required, in accordance with the current version of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR), they should also be notified to the HSE.
- 📦 Receive regular and ad-hoc reports, on SHEF issues, from managers and / or members of staff with a specific SHEF reference.
- 📦 Ensure there is a standard agenda item on board / management meetings that record SHEF hazards reported and action taken to reduce risks.
- 📦 Submit an annual SHEF report, to the Board, with prioritised recommendations, to enable budgetary arrangements and / or constraints to be set.

### SHEF ADVISORS

The Company is able to provide the 'competent advice' and assistance required by the 'relevant statutory provision(s)' and more specifically, the current version of **Management of Health and Safety at Work Regulations**, from within its own workforce.

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## COMPETENT PERSONS

### Supervisors and managers with specific SHEF responsibilities

In addition to the general responsibilities placed upon all staff members, supervisors and managers, in control of any premise(s), plant, process or persons, will undertake the following additional duties:

- 📌 To ensure that all staff have read and understood the Company's SHEF policy and procedures and any local procedures / guidelines that may be relevant.
- 📌 To ensure that 'suitable and sufficient' risk assessments have been undertaken, by a 'competent person', where 'significant' risk(s) exist and the necessary control measures have been, or are being, implemented.
- 📌 Where additional resources are necessary, that are beyond individual authority levels, an Action Plan should be submitted, with costs, to the Director responsible for SHEF compliance, for action or submission to the Board, for approval.
- 📌 To ensure that the Accident Book / Record is completed, for all accidents and incidents, including 'near miss' occurrences and to ensure that appropriate remedial action is taken, to prevent any reoccurrence.
- 📌 To report all 'notifiable' incidents, as specified in RIDDOR, to the Director responsible for SHEF compliance, in order that the SHEF Advisors can be instructed to assist, as necessary (e.g. formal notification to the HSE and formal incident investigation etc.)
- 📌 To ensure that all staff receive appropriate SHEF information, instruction, training and supervision, to competently undertake their tasks and responsibilities.

### First Aiders

In addition to the general responsibilities placed upon all staff members, First Aiders will undertake the following additional duties:

- 📌 To respond, quickly and calmly, to First Aid incident request calls.
- 📌 To assess casualties with care and administer limited First Aid treatment, referring the casualty to the Ambulance Service, Hospital or General Practitioner (GP) direct, or to return to work, according to the seriousness of the condition.
- 📌 To remain with any casualty, if necessary, until transferred to qualified medical personnel.
- 📌 To produce a report, on all first aid administered and all casualties transferred to Hospital or GP, to the manager with specific SHEF responsibilities.
- 📌 To be responsible for First Aid boxes, within their area of responsibility and to replenish stock levels, as required
- 📌 To ensure that the certificate of First Aid 'competence' remains current and to notify the manager with specific SHEF responsibilities of the expiry date, at least two months beforehand
- 📌 To attend training programmes and / or updates, as required, to ensure continued competence

## ALL MEMBERS OF STAFF

All members of staff, irrespective of any other additional and / or separate responsibilities, are required to take reasonable care of their own health and safety and in addition, will also be personally responsible for:

- 📌 The safety of other persons who may be affected by their work activities or omissions.
- 📌 Adhering to the Company's SHEF policy and procedures.
- 📌 Understanding their position, within the Company, as well as the relevant systems, procedures and controls, applicable to their work place and / or work activity.
- 📌 Reporting any shortcomings in SHEF arrangements and / or procedures to the Manager with specific SHEF responsibilities.
- 📌 Using the SHEF equipment provided, in accordance with the rules applicable to the individual item.
- 📌 Attending SHEF training and applying what they have been taught, in the workplace.
- 📌 Recording all accidents, incidents and 'near miss' occurrences in the Accident Book / Record and reporting to incident the Manager with specific SHEF responsibilities.

All new members of staff will receive induction training and an induction pack, at the earliest possible opportunity following their start day, which will cover:

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- ❖ The SHEF Policy - each new member of staff will have access to the 'Policy Statement' and shown how to access the procedures.
- ❖ Staff roles and responsibilities and how to report SHEF concerns.
- ❖ Identification of individuals with specific SHEF functions (e.g. Persons responsible for SHEF management, First Aiders, Fire Marshals or Wardens etc.)
- ❖ First aid arrangements.
- ❖ Fire safety and emergency evacuation procedures.
- ❖ Any specific training needs.

The Person(s) responsible for SHEF management will complete [SHEF Induction Form \(see appendix\)](#) for each new member of staff, in conjunction with the [Employment Health Questionnaire \(see appendix\)](#), before adding the relevant details to the [SHEF Training Record \(see appendix\)](#).

### CONTRACTORS, SELF-EMPLOYED AND TEMPORARY (INCLUDING AGENCY) STAFF

All non-employees will be made aware of and expected to comply with, the SHEF policy and procedures for the Company. In addition, they will also be expected to:

- ❖ Be fully aware of the responsibilities and requirements, placed upon them by the 'relevant statutory provisions' applicable to their specific work activity.
- ❖ Carry out 'suitable and sufficient' assessments of 'significant' risks, in relation to their activities, ensuring that appropriate SHEF arrangements are implemented, in liaison with both staff employed by and contractors engaged by the Company.
- ❖ Comply with all / any 'reasonable' SHEF instruction(s), given by an appropriately authorised member of staff, employed by the Company.
- ❖ Co-operate with all / any member of staff, employed by the Company, to ensure the highest possible SHEF standard, on all contracts.
- ❖ Comply with any higher SHEF standard, even if the standard(s) stipulated by the Company are higher than basic minimum SHEF requirements.

### WORKFORCE CONSULTATION AND CONTROL

Although only required by statute, in relation to employees, consultation will be conducted with all members of staff and contractors, where relevant, in relation to the following SHEF issues:

- ❖ Change(s) that could significantly and / or substantially affect SHEF arrangements (e.g. procedures, equipment, operational processes etc.);
- ❖ Arrangements for nominating and / or training of 'competent persons';
- ❖ Information regarding 'significant' risks and dangerous materials or processes, arising from work activity, the measures to reduce or eliminate the risk(s) or the emergency procedures needed to deal with any 'residual' risk or danger.
- ❖ Planning and scheduling of SHEF training programmes.
- ❖ Consequences of introducing new technology.

**IMPORTANT NOTE:** *Disciplinary action may be taken against any member of staff, or contractor, who intentionally or recklessly interferes with, or misuses, anything provided in the interests of safety, health and welfare or the protection of the environment. This includes any other act(s) or omission(s) that might jeopardise the health and / or safety of any person (e.g. specifically, horseplay, practical joking etc.) or harm the environment, or the violation of any SHEF rule(s) and / or failure to undertake any general or specific duties, as stated in this policy.*

*Furthermore, any person found to be under the influence of alcohol or any other intoxicating substance, which might impair motor skills or judgement, whether prescribed or otherwise, will be removed from the job and suspended, pending a disciplinary hearing.*

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## ARRANGEMENTS (I.E. PROCEDURES) FOR SHEF MANAGEMENT

### SHEF MANAGEMENT SYSTEM (SMS)

This SMS is intended to provide a systematic way of identifying SHEF hazards and controlling the 'significant' risks that arise from them. It can then become part of the culture of the Company and how both staff and contractors perform their operational duties. It provides for goal setting and planning, as well as the monitoring of SHEF performance, to maintain an assurance that the consequential risk controls are effective. It can also then be formally audited and subjected to independent accreditation (e.g. OSHAS18001 or its successor, ISO45001) by an external third-party approvals organisation (e.g. BSI, Achilles, CHAS, SMAS etc.), if required.

On this occasion the SMS is not intended to be subjected to independent external auditing, although these SHEF procedures have been developed, by us, for the protection of all 'relevant persons' (i.e. employees, non-employed staff, contractors and visitors etc.) and the environment, which could be 'reasonably foreseen' to be affected by the conduct of its undertaking and apply equally outside of the UK.

Any member of staff, whether permanent or temporary, or any Contractor, who is in doubt with regard to any SHEF issue, in relation to any individual or collective activity or procedure, place of work, plant or equipment (e.g. use and / or disposal of any hazardous material, maintenance of any vehicle, machinery or equipment etc.), should raise the matter with the Supervisor or Manager with specific SHEF responsibilities, in the first instance.

### RISK REGISTER

This is a simple SHEF compliance chart (see table below), which highlights those risks that pose a 'significant' threat of harm to our staff and other 'relevant persons'. For each risk item, information is provided regarding its nature and a general evaluation of the severity of the potential outcomes.

To simplify matters further, the chart indicates the strategic procedures that apply to us (i.e. those that are not greyed out), which can be referred to later in this document. Each procedure contains an introductory policy statement, specific to the subject heading and a 'generic' assessment of risk, where appropriate.

Risk register sections	
Accident prevention, first aid and incident reporting	Alcohol, drugs and substance misuse
Behavioural safety, leadership and cultural alignment	Cleaning and hygiene
Construction (Design and Management) - Designer, including Principal Designer (PD)	Contractor procurement and control
Display Screen Equipment (DSE)	Driving and the use of mobile phones
Electrical and gas safety	Environmental issues
Equality, disability and diversity issues	Expectant and nursing mothers
Fire safety	Lone working and personal safety
Manual handling operations	Occupational health (including stress)
Overseas and / or long-distance travel	Personal protective equipment (PPE)
Provision and use of work equipment	Risk management, assessment and control
Temporary, agency and migrant workers	Violence and bullying
Workplace health, safety and welfare	Young persons and children

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## ACCIDENT PREVENTION, FIRST AID AND INCIDENT REPORTING

### Policy statement

We aim to reduce the likelihood and consequence(s) of any failure of our safe systems of work (SSoW) by ensuring that:

- 📌 A 'suitable and sufficient' assessment of all 'foreseeable' and 'significant' risks is undertaken (see separate procedure), to identify, eliminate, where necessary or otherwise control the likelihood of harm, to persons, property or plant and equipment;
- 📌 All 'relevant persons' are made aware of all / any hazards that could affect them, where possible;
- 📌 Members of staff and contractors are encouraged to care about all 'relevant persons', including themselves and their working environment;
- 📌 Members of staff and contractors raise concerns, where necessary, reporting unsafe conditions and unsafe acts, whether or not they actually result in harm (i.e. near miss / hit occurrences);
- 📌 All unsafe conditions and unsafe acts, including any 'near miss (hit)', are investigated, in the manner considered most appropriate, by the member of staff, although this should always reflect the severity of the incident and incorporate a review of the relevant risk assessment(s);
- 📌 Our SHEF Advisors will investigate all serious incidents;
- 📌 The 'learning outcomes' of all incident investigations will be broadcast to all members of staff and relevant contractors, in order to prevent any reoccurrence.

### Definitions

- 📌 **Accident** – Any 'chance' event, which is unplanned, undesired and / or unintended.  
*Note: all accidents are incidents.*
- 📌 **First aid** – The 'treatment' of minor injuries, or treatment for the purposes of preserving life and / or minimising the consequence(s) of injury or illness, until help from a medical practitioner is obtained.
- 📌 **Incident** – Any 'significant' event, whether or not it is planned, desired or intended, although in this context, having a negative effect or consequence (e.g. some form of harm, including reputational harm).  
*Note: not all incidents are accidents (e.g. arson, assault, bullying etc.)*

### Primary statutory provisions (latest versions)

- 📌 **Management of Health and Safety at Work Regulations**
- 📌 **Health and Safety (First Aid) Regulations**
- 📌 **Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR)**
- 📌 **Data Protection Act**
- 📌 **Social Security (Claims and Payments) Regulations**

### Assessment (generic) and provision of first aid and incident procedures

Although the legal requirement for first aid provision applies only to employees, we will also consider the presence of visitors and contractors, when deciding upon the level of first aid provision in locations under our control. This is, normally, most efficiently and effectively dealt with on an individual premise or site basis, following an appropriate local (i.e. premises or site) assessment of the risk(s) involved.

However, this 'generic' statement should be seen as a starting point, only, from which to adapt the local assessment(s). Clearly, 'specific' operational and / or environmental constraints presented need to be considered, as does the use of mobile phones in summoning outside assistance. Accordingly, in the initial stages, the following 'generic' circumstances exist, with our range of activities:

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Typical first aid arrangements			
Category	Type of need	Competence	Notes
General office activities: (Staff, visitors and contractors)	Minor injuries caused by: <ul style="list-style-type: none"> <li>☛ Slips, trips and falls</li> <li>☛ Sharp objects</li> <li>☛ Burns and scalds</li> <li>☛ Insect bites and stings</li> </ul>	At least one 'Appointed Person' should be present, to administer first aid or, if necessary, preserve life until the arrival of a medical practitioner.	All members of staff and contractors should be aware of how to protect themselves and deal with minor injuries.
Visiting other premises: (Staff)	Minor injuries (as above) to potential fatal consequences, caused by: <ul style="list-style-type: none"> <li>☛ Driving (collisions)</li> <li>☛ Lone working (falls, assault etc.)</li> </ul>	All lone workers should be trained as an 'Appointed Person'.	Lone workers should be able to self-administer first aid treatment for minor injuries and / or summon assistance.
Reception activities in multi-let buildings: (Visitors and members of the public)	In addition to the office activities, above members of the public could experience naturally occurring conditions, some of which could be fatal (e.g. heart attack etc.)	Contractors to provide at least one 'Appointed Person', at reception, during operational hours.	Receptionist(s) should be able to administer first aid treatment, including the use of an Automatic External Defibrillator (AED), where provided and ensure that all visiting contractors possess their own, or have access to shared, first aid provision.
Projects: (Contractors)	All types of minor and major, including fatal, consequences caused by: <ul style="list-style-type: none"> <li>☛ Construction activity</li> <li>☛ Environmental site conditions /</li> </ul>	Principal Contractors to provide the level of competent person(s) identified in the project 'specific' risk assessment / construction phase plan (CPP).	All project risks to be identified, prior to any work activity, with appropriate provision in place, at or before commencement.

As incidents involving a first aid response occur, this 'generic' assessment and / or the 'specific' local assessments may need to be amended, to reflect any changes that may be required. Special circumstances may also necessitate different and / or additional provisions and establishing a higher standard may well be justified and a [Record of First Aid Provision \(see appendix\)](#) should, therefore, be completed for all premises or sites and guidance on the [Contents of First Aid Boxes \(see appendix\)](#) has also been provided.

Where provision needs to be shared, we will liaise with one or more other Companies, as necessary, although we will always ensure that:

- ☛ adequate and appropriate equipment and facilities are available, to enable first aid to be rendered to all those who are injured or become ill whilst on our property;
- ☛ an adequate number of suitably trained first aiders are available, at all relevant times; and
- ☛ information, about the arrangements that have been made, including the location of equipment, facilities and first aiders, is prominently displayed.

### First aid response

After an initial (i.e. dynamic) assessment of the situation (i.e. considering **d**anger, **a**irway, **b**ones, **c**irculation, or D-ABC), in the event of a first aider determining that the illness or injury of any injured person (IP)(s) is either life threatening or otherwise serious enough to call an ambulance, they should remain with the IP(s), pending the arrival of a medical practitioner and may also need to accompany the IP(s) to hospital.

If an ambulance is not considered necessary, by either the first aider or the IP(s) but a referral to a medical practitioner (i.e. an accident and emergency department, urgent care centre or general practitioner etc.) is recommended or suggested, consideration should be given to arranging an alternative form of transport (i.e. taxi etc.), on behalf of the IP(s), although there is no statutory duty for the first aider to attend the medical practitioner, in these circumstances.

### Internal incident reporting

All incidents, including near-miss (near hit) occurrences, must be reported, internally, either by the (IP), a manager, or a first aider, via the Accident Book or [Incident Report Form \(see appendix\)](#) for the relevant building or site, at which the incident occurred.

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Where incidents occur at any other employers' premises, or site, the Accident Book or [Incident Report Form \(see appendix\)](#) should be completed at that premises or site and duplicated on return to the normal place of work. In either case, the tear-out page / report form should be completed and sent to the Director responsible for SHEF compliance, under confidential cover, at the very earliest opportunity.

### External incident reporting (RIDDOR notification to HSE)

Where someone has died (except for suicide), has been injured or suffered ill health because of a work-related incident, including those resulting in **over seven consecutive days** of incapacity for work or involving treatment at hospital of any non-employee (e.g. a member of the public, visitor or contractor), as well as certain 'specified' dangerous occurrences and gas incidents, the incident may also need to be 'notified'.

- **Specified injuries** include (for example):
  - Fractures, other than to fingers, thumbs and toes
  - Amputations
  - Any injury likely to lead to permanent loss of sight or reduction in sight, including any penetration into the eye
  - Any crush injury to the head or torso causing damage to the brain or internal organs
  - Serious burns (including scalding) which:
    - covers more than 10% of the body
    - causes significant damage to the eyes, respiratory system or other vital organs
  - Any scalping requiring hospital treatment
  - Any loss of consciousness caused by head injury or asphyxia
  - Any other injury arising from working in an enclosed space which:
    - leads to hypothermia or heat-induced illness
    - requires resuscitation or admittance to hospital for more than 24 hours
- **Specified occupational diseases** include (for example):
  - Carpal tunnel syndrome
  - Severe cramp of the hand or forearm
  - Occupational dermatitis
  - Hand-arm vibration syndrome (HAVS)
  - Occupational asthma
  - Tendonitis or tenosynovitis of the hand or forearm
  - Any occupational cancer
  - Any disease attributed to an occupational exposure to a biological agent
- **Specified dangerous occurrences** include (for example):
  - The collapse, overturning or failure of load-bearing parts of lifts and lifting equipment
  - Plant or equipment coming into contact with overhead power lines
  - The accidental release of any substance which could cause injury to any person
- **Gas incidents** - registered Gas Safe engineers must provide details of any gas appliances or fittings that they consider to be dangerous, to such an extent that people could die, lose consciousness or require hospital treatment. The danger could be due to the design, construction, installation, modification or servicing of that appliance or fitting, which could cause:
  - an accidental leakage of gas
  - incomplete combustion of gas or
  - inadequate removal of products of the combustion of gas
- **Over seven (7) day incapacitation**
  - Notification must also be undertaken where a workplace accident results in an employee or self-employed person being away from work, or unable to perform their normal work duties, for more than seven consecutive days, as the result of their injury. This seven-day period does not include the day of the accident, but does include weekends and rest days. The report must be made within ten (10) days of the accident.
  - In addition, ALL workplace accidents must be recorded, but not necessarily notified, where they result in a worker being unable to perform their normal workplace duties, for more than three consecutive days. Unless notifiable, the Accident Book or [Incident Report Form \(see appendix\)](#) will normally be enough, in these cases.

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❖ **Non-fatal accidents to non-workers** (e.g. visitors, members of the public etc.)

- ❖ Accidents to members of the public, or others, who are not at work, must be reported if they result in an injury and the person is taken directly from the scene of the accident to hospital for 'treatment' to that injury.
- ❖ Examinations and diagnostic tests do not constitute 'treatment' in such circumstances.

Notification, where required, will be undertaken, by our SHEF Advisors, as soon as possible and followed up, using the HSE online reporting system, within ten (10) days of the incident.

However, in the case of a fatality or a major incident, this should also be notified by telephone, immediately.

**Note:** *There is no need to notify the HSE where people are taken to hospital, purely as a precaution, when no injury is apparent.*

**Incident Investigation**

All incidents that result in first aid treatment being required, or where it could have resulted (i.e. a 'near-miss' occurrence), or come within the scope of **RIDDOR** will be investigated, as necessary, in an attempt to:

- ❖ Identify the 'root' cause(s)
- ❖ Prevent any 'failure' repeating itself
- ❖ Ensure the relevant risk assessment(s) and / procedure(s) are reviewed and where necessary, revised, to reduce the risk of repeat failures
- ❖ Identify any training needs arising from the incident

As soon as possible after treatment, the injured person(s) should complete the Accident Book or [Incident Report Form \(see appendix\)](#), or, in the event that the injured person is unable to complete the form, the Supervisor or Manager in control of the premises should complete the entry.

Incidents will be classified as 'near-miss', 'minor injury', '7-day reportable', 'dangerous occurrence', 'major injury' or 'fatality' and investigated as follows:

- ❖ All 'near-misses' and 'minor injuries' will be subjected to a 'preliminary' investigation, by the Supervisor or Manager in control of the premises, who will produce a report, containing a judgment about the 'root' cause(s).
- ❖ All other types of incident will be notified to our SHEF Advisors, at the earliest possible opportunity, in order that they can attend the site, as considered necessary. The Supervisor or Manager in control of the premises will also undertake a 'preliminary' investigation, although the details, together with any evidence, will then be provided to the SHEF Advisors, in order that they can conduct a 'full' investigation.
- ❖ All reports, together with any recommendations for preventing a recurrence, will then be sent to the Director responsible for SHEF compliance, who will maintain all reports, records and relevant documents and advise the insurers of any potential claim.

**Civil claims procedures (personal injury)**

- ❖ **Acknowledgement of the Letter of Claim** - The protocol requires that letters of claims are acknowledged, **within 21 DAYS of the date of posting** and the acknowledgement must advise the name of the insurers, who must be notified, immediately (they will probably handle all correspondence and direct evidence collection, at this point).
- ❖ **Investigation of the claim** - Having received the Letter of Claim and acknowledged it, the Company has **no more than 3 MONTHS from the date of posting** of the Letter of Claim, to investigate the claim and respond.
- ❖ **Reply to the Letter of Claim** - Specified documents have to be sent to the different parties, with the reply and if these are not submitted, without good reason then there are automatic financial penalties, payable for each piece of evidence missing, within 14 days of receipt of evidence. In addition, we could also lose the right to attend court and defend the case, hence the need to notify our insurers, without any delay, whatsoever.

Accordingly, all Supervisors and Managers with specific SHEF responsibilities need to be aware of the need to complete an [Incident Report Form \(see appendix\)](#), in response to all **RIDDOR** and non-**RIDDOR** incidents, as a matter of course.

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## ALCOHOL, DRUGS AND SUBSTANCE MISUSE

### Policy statement

While for many people, drinking alcohol is a positive part of life and does not cause any problems; the misuse of alcohol can lead to harmful outcomes. It is also an offence for any person, knowingly, to permit the use of controlled substances on their premises except in specified circumstances (e.g. when they have been prescribed by a doctor).

Alcohol and drug misuse is everyone's concern and in the context of work, not only can it damage the misuser's health, it can cost the Company, through absenteeism and reduced productivity, as well as increasing the risk of accidents.

Accordingly, although we have decided not to adopt an alcohol or drug screening policy, as we believe that it does not provide a complete answer to problems caused by substance misuse, the possession and / or supply of illegal drugs, at work, will be reported immediately to the Police.

We will endeavour to help and support affected employees rather than punish or even dismiss them but they are all expected to be aware, at the very least, that drivers must not be under the influence of alcohol or drugs while driving, or even in charge of a vehicle.

### Definitions

- ❖ **Alcohol** – An organic compound, normally ethyl alcohol (ethanol), found in alcoholic beverages, consumed for their psychoactive (i.e. intoxicating) effects.
- ❖ **Controlled substance** – Any drug or chemical substance whose manufacture, possession and / or use is regulated by the government.
- ❖ **Drugs** – Chemical substances used in the treatment, cure, prevention, or diagnosis of disease or used to otherwise enhance physical or mental well-being.
  - ❖ Illegal drug – Any drug obtained illegally, including but not limited to, heroin, cannabis / marijuana, cocaine, ecstasy and amphetamines etc.
  - ❖ Legal drug – Any drug obtained either on a doctor's 'prescription' or a 'non-prescription' drug (e.g. cold remedies etc.) obtained from a pharmacist or authorised dispenser.
  - ❖ Legal high – any substance, which serves no medicinal purpose, taken for 'recreational' purposes, usually for the same effect as illegal drugs and accordingly, treated as illegal, in the workplace.
- ❖ **Substance misuse** – Any use of alcohol, drug(s) and / or other substance(s) that interferes with a persons' health, performance, capability or conduct.

### Primary statutory provisions (latest versions)

- ❖ **Management of Health and Safety at Work Regulations**
- ❖ **Misuse of Drugs Act**
- ❖ **Road Traffic Act**
- ❖ **Transport and Works Act**

### Assessment (generic) and provision of alcohol and substance misuse procedures

Being under the influence of alcohol or drugs can seriously impair an individual's judgement and reactions, leading to an increased risk of accidents and injuries.

The aim of this policy, therefore, is to ensure the safety of all members of staff and visitors, by having clear rules in place, regarding the use and / or possession of alcohol and drugs and to support those who have reported a problem with alcohol or drug dependence.

However, any misconduct, poor performance and / or long-term substance related ill health, in relation to substance misuse, will be dealt with in accordance the disciplinary, capability and sickness absence procedures, respectively.

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## Rules

All members of staff and contractors must be capable of undertaking their full range of work activities, at all times, unless undertaking '*light (i.e. restricted) duties*' and shall, in addition to any other site or Company rules:

- ☒ ensure they are aware of the side effects of any '*prescription*' drugs (e.g. drowsiness etc.);
- ☒ advise their Supervisor or Manager with specific SHEF responsibilities, immediately, of any side effects of prescription drugs, which may affect work performance or the health and safety of themselves or others.

They shall not:

- ☒ report, or try to report, for work when unfit, in the opinion of the Supervisor or Manager in control of the premises, due to alcohol, drugs (whether illegal or not) or to substance misuse;
- ☒ be in possession of alcohol or illegal drugs in the workplace;
- ☒ supply others with illegal drugs in the workplace;
- ☒ supply others with alcohol in the workplace;
- ☒ consume alcohol or illegal drugs or abuse any substance whilst at work.

When there is reasonable belief that an individual is under the influence of alcohol, drugs or other substance, in the course of their work activities, they must be suspended, immediately, pending investigation and if any supply of illegal substances is believed to have occurred, the incident must also be reported to the Police.

Subject to the findings of the investigation(s), contravention of these rules and / or any criminal activity will be considered to be an act of gross misconduct and appropriate disciplinary action will be taken, which may include dismissal.

## Help and advice

We will endeavour to ensure that advice and help is made available to any member of staff who feels they have a problem related to substance misuse, although, in the first instance, individuals are encouraged to seek help from their General Practitioner. Thereafter and with the person's consent, a referral to an Occupational Health Physician will be considered.

It may also be advantageous, to request that the individual refrains from work temporarily, or undertakes '*light duties*' to ensure their own safety and that of others. We may also allow additional time off (normally unpaid) for members of staff to obtain treatment or attend support groups.

Any member of staff who seeks our assistance, in finding treatment for a substance misuse problem, has our complete assurance of confidentiality.

Some useful links to websites are provided below:

- ☒ Alcoholics Anonymous Tel 0845 769 7555 [www.alcoholics-anonymous.org.uk](http://www.alcoholics-anonymous.org.uk)
- ☒ ACAD (Advice and Counselling on Alcohol and Drugs) [www.acad.org.uk](http://www.acad.org.uk)
- ☒ FRANK Tel 0800 776 600 (24 hours) [www.talktofrank.com](http://www.talktofrank.com)
- ☒ NHS Choices [www.nhs.uk/LiveWell/Alcohol](http://www.nhs.uk/LiveWell/Alcohol) or [www.nhs.uk/LiveWell/Drugs](http://www.nhs.uk/LiveWell/Drugs)

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## BEHAVIOURAL SAFETY, LEADERSHIP AND CULTURAL ALIGNMENT

### Policy statement

We aim to achieve a workplace where the safety, health and welfare of our staff and any persons affected by what we do, as well as the safe management of projects, are central to our success.

Behavioural safety is closely linked to our own supportive leadership style and provides an excellent tool to improve safety culture and performance in the workplace, having a proactive bottom-up focus, which encourages individuals and teams to consider the potential for incident involvement and to assess their own behaviour as safe or unsafe.

Accordingly, we are committed to look at new approaches and learn from the analysis of accidents and ill health, although we seek the active involvement of both our staff and our contractors. We are also aware that, once a person has been engaged in a training or personal development environment, there is an assumption that any new or reinforced learning will be applied correctly and safely, even though there are many factors that influence and reinforce learning and behaviours.

### Definitions

- 📌 **Behavioural (behaviour based) safety** – The application of the science of behavioural change to real issues or, a process that creates a safety partnership between managers and staff that continually focuses their ‘*attentions*’ and ‘*actions*’ on their own and others, routine safety behaviour.
- 📌 **Culture** – the ideas, customs, and social behaviour of people or society
- 📌 **Habit** – A regular or settled practice that is, under normal circumstances, hard to give up.
- 📌 **Value** - The principles or standards of behaviour that determine what is important in life.

### Primary statutory provisions (latest versions)

- 📌 **Management of Health and Safety at Work Regulations**
- 📌 **Health and Safety (Consultation with Employees) Regulations**

### Assessment (generic) and provision of behavioural safety procedures

Many safety interventions, in the workplace, focus on factors (e.g. engineering controls, signage, rules etc.) that occur before behaviour is involved. However, although these factors can be effective, in producing safe reactions, initially, it is whether or not these become a good ‘*habit*’ that determines the safety ‘*culture*’ of an individual or Company.

We intend, therefore, to focus on what our staff and contractors do, analyse why they do it and then apply behavioural intervention strategies to achieve continuous improvement.

However, our safety management system is based on a hierarchy of hazard controls (i.e. elimination, risk reduction, isolation, rules and training, PPE and discipline etc.), which will remain, as behavioural systems should not be used in preference to these ‘reasonably practicable’ safety measures.

### Total safety culture

This is our ultimate aim and will eventually require the staff, at all levels and contractors to:

- 📌 Hold safety as a ‘*value*’ and not just a priority;
- 📌 Take responsibility for the safety of their co-workers, in addition to themselves; and
- 📌 Be willing and able to act on their sense of responsibility, by going ‘**beyond the call of duty**’.

The achievement of noticeable and lasting results, that achieve a total safety culture, will require:

- 📌 Generally transparent and fair leadership and a strong commitment, from the top, to maintaining and improving behavioural safety.
- 📌 Integration of ‘**dynamic risk assessment**’, as part of our normal work activity.
- 📌 Respectful, trusting and open communication between staff and contractors and their managers.
- 📌 A commitment to improving the profile of and engagement in, SHEF issues, by emphasising safe and unsafe behaviour, rather than reactive indicators (e.g. accident statistics etc.), as an opportunity to learn and improve.
- 📌 A strong, consistent and timely reaction to the discovery of unsafe acts and conditions, whether they result in injury or not and in particular, the approach by all to ‘**NEVER WALK BY**’..!!!
- 📌 A ‘**feedback loop**’, which enables all staff and contractors to consistently learn and grow, through an awareness of different ways to consider or query human factors (i.e. how we do what we do, and most importantly, why we do what we do).

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## CLEANING AND HYGIENE

### Policy statement

We aim to provide and maintain clean and hygienic workplace environments, including food preparation areas and sanitary facilities, for our staff, contractors and visitors.

### Definitions

- ▣ **Cleaning** – The removal of dirt, marks and stains from workplace surfaces and facilities.
- ▣ **Hygiene** – A set of conditions and practices performed to maintain health and prevent the spread of disease(s).

### Primary statutory provisions (latest versions)

- ▣ **Management of Health and Safety at Work Regulations**
- ▣ **Workplace (Health, Safety and Welfare) Regulations**
- ▣ **Control of Substances Hazardous to Health Regulations**

### Assessment (generic) and provision of safe cleaning procedures

Dirty and unhygienic workplaces present more downsides than simple aesthetics and apart from making our properties appear disorganised and run down, it can pose health, safety and potentially, even fire risks to our staff, contractors and visitors.

Dirty workplaces, especially unhygienic food preparation areas and sanitary facilities, present many forms of bacteria, some of which can be dangerous and cause serious illnesses and occasionally, chronic conditions, such as psittacosis (i.e. parrot fever) or ornithosis, which is contracted from the droppings of birds.

Dirty workplaces can also lead to indoor air pollution and one of the leading causes is the poor cleaning of carpets, as simple vacuuming does not really clean. It simply displaces the majority of the dust, as most of the dust goes right back out the air holes in the bag, or gets ground into the carpet, which is why shampoo or steam cleaning of carpets, it is more efficient at removing dust and contaminants.

Accordingly, although we have instructed a number of professional cleaning companies, we expect all of our staff and contractors to keep their workplaces clean and tidy, as clean and tidy workplace is, generally, a safe workplace.

### Cleaning schedules and programmes

All person(s) in control of premises are required to ensure that an effective cleaning regime is established and maintained, based on a formal cleaning schedule, taking account of the following aspects:

- ▣ **Cleaning Methods** - The methods, materials and equipment to be used for individual cleaning tasks should be specified in the cleaning schedule and incorporated in cleaner's training.
- ▣ **Cleaning Preparations** - These may be classified as toxic, corrosive, harmful or irritant and / or take the form of acid or alkali-based substances, detergents or solvent-based products depending on the form of soiling they are designed to remove.
  - ▣ All cleaners should be capable of interpreting the data incorporated in the safety data information sheet provided by suppliers of hazardous cleaning agents and preparations
  - ▣ Containers should be suitably labeled in accordance with these regulations and stored safely in a locked and appropriately labeled cupboard.
- ▣ **Cleaning Procedures** - The training and supervision of cleaning staff, the setting of acceptable standards of cleaning, the selection and use of safe cleaning agents and preparations, the selection and use of appropriate cleaning equipment and the implementation of formally established cleaning schedules or programmes.
- ▣ **Cleaning Standards** - The standards to be achieved for different structural surfaces, items of equipment, etc. should be specified and they should receive on-the-job training and supervision in the achievement of specified cleaning standards. In particular treatment and other rooms requiring high standards of hygiene must stipulate the cleaning standards required to the Cleaner / Cleaning Contractor.
- ▣ **Hygiene** - Work conditions and facilities, including washing and sanitary conveniences, should be adequate to enable workers to maintain good standards of personal hygiene.

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## Risk assessments

In addition to the requirement for general activity assessments (e.g. manual handling, working at height etc.), many cleaning agents incorporate substances that may be classified as hazardous to health, under the COSHH regulations and accordingly, the following action must also be taken, although additional hazardous substances procedures exist (see separate policy statement), which should be read in conjunction with these procedures:

- ▣ A COSHH risk assessment must be immediately available, for each substance used.
- ▣ A manufacturers safety data (MSD) information sheet must be obtained from the supplier and referred to when undertaking the COSHH assessment.
- ▣ Special care should be taken in mixing any two substances, or more, as the combination may be very harmful (i.e. bleach and harpic), whereas each substance on its own may not.
- ▣ Appropriate aspects of the COSHH assessment and MSD should be incorporated into the training and instructions provided for cleaning staff.

## Portable cleaning equipment

This may take a number of forms, from hand-held brushes, brooms and mops to various electrically operated appliances, such as vacuum cleaners and scrubbing and drying equipment, including extension leads, all of which is classed as '*work equipment*' under the Provision and Use of Work Equipment Regulations (PUWER) and if electrically operated, under the Electricity at Work Regulations (EWR) and used and maintained in accordance with the relevant procedures (see separate policy statements), which should be read in conjunction with these procedures.

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## CONSTRUCTION (DESIGN AND MANAGEMENT) - DESIGNER, INCLUDING PRINCIPAL DESIGNER (PD)

### Policy statement

We understand that, as a Designer or PD, we are appointed for the purposes of, or may become involved with, the preparation, alteration or modification of any design for construction projects.

We are responsible for making the Client aware of their statutory duties, although in relation to a 'domestic' Client, only and where agreed, in writing, we will accept and undertake the [Client duties](#) and responsibilities and at all other times we will work under the control of the Contractor or Principal Contractor (PC), as if they were the 'domestic' Client.

We are also responsible for incorporating any pre-construction information (PCI) into our design(s) and eliminating, where possible, any foreseeable health and safety risks, or otherwise controlling those risks, in readiness for submission to the PD. Where we are the PD (i.e. appointed, by the Client, to "take control" of the pre-construction phase), we will take account of all such information, in planning, managing and co-ordinating health and safety, in the pre-construction phase and developing the PCI, for other designers and contractors, throughout the project.

Accordingly, we understand that we must liaise and co-operate with the Client (or PC if a 'domestic' Client) and all other designers and contractors, to facilitate the elimination, reduction and / or control of foreseeable risks and the co-ordination of the construction work.

### Definitions

- 📌 **Client** – Any person, company or organisation for whom a project is carried out, although can also be referred to as the 'employer', in relation to the Joint Contracts Tribunal (JCT) standard contract
- 📌 **Construction work** – Any building, civil engineering or construction work including, amongst other things, alteration, refurbishment, maintenance, dismantling or demolition, site clearance and excavation, assembly or disassembly of a pre-fabricated structure, waste removal following demolition or disassembly of a structure, the installation, repair or maintenance of fixed services (e.g. mechanical, electrical, gas, telecommunications etc.)
- 📌 **Contractor** – Any person, company or organisation that carries out, manages or controls construction work
- 📌 **Design** – Any drawings, design details, specifications and bills of quantities relating to a structure, and calculations prepared for the purpose of a design
- 📌 **Designer** – Any person (including a client or contractor) who prepares or modifies a design, or instructs any person under their control to do so, relating to a structure, or fixed service
- 📌 **Principal Contractor** – The Contractor appointed under regulation 5(1)(b) to perform the specified duties in the CDM regulations, 12 to 14, as indicated below
- 📌 **Principal Designer** – The Designer appointed under regulation 5(1)(a) to perform the specified duties in the CDM regulations, 11 and 12, as indicated below
- 📌 **Project** – Any construction work, including the planning, design and / or management of the work, from the beginning to the end of the work

### Primary statutory provisions (latest versions)

- 📌 **Management of Health and Safety at Work Regulations**
- 📌 **The Construction (Design and Management) Regulations**

### Assessment (generic) and provision of CDM (Designer) procedures

Our design decision(s) can affect the health and safety of all those involved in 'construction work', which is generally considered to present more and / or higher risk(s), as well as those who use a structure or installation and those who maintain, refurbish and / or ultimately demolish it.

When acting as PD, specifically, we have an important role in influencing how risks to health and safety are managed, throughout a project. Design decisions made during the pre-construction phase have a 'significant' influence in ensuring that the project is delivered in a way that secures the health and safety of everyone affected by the work. We will, therefore, make sure that we maintain the necessary skills, knowledge and experience, to carry out this type of work, together with the relevant organisational procedures and capability.

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### Organisational capability

We will take all reasonable to ensure that all staff and any contractors are 'competent' for the role and / or activity expected of them, in a safe, healthy and environmentally considerate way, having the necessary technical and safety-related skills, knowledge and experience (SKE), which are proportionate to the complexity of the project and the range and nature of the risks involved.

To achieve this, we have established an Approved Suppliers Register ([see contractor procurement and control procedure](#)), from which to choose a list of Suppliers that are prequalified.

### Pre-construction information (PCI)

We will continuously co-operate with all duty holders, to identify any 'significant' hazard(s) (e.g. structural defects, contaminated land, buried services, water courses and adjacent property details etc.), utilising our expertise, prior project knowledge and / or acquired information, available site / building plans and where necessary other investigations and / or surveys etc.

Where we are the PD, we will liaise with the Client to ensure that this project-'specific' (i.e. not generic) information is developed, as a PCI document, to enable all of the designers and contractors to carry out their duties and for the PC or sole Contractor to produce a 'draft' Construction Phase Plan (CPP), for approval by the Client and / or us, prior to commencing any work.

The primary purpose of the PCI is to undertake an assessment of the inherent risk(s) posed to and by the construction work, in order that they can be designed out, completely, wherever possible or reduced and / or controlled, in some other way.

### Determination and allocation of resources

The success of any 'project' will, ultimately, be determined by the performance of the project team, in relation to the management 'triangle' (i.e. scope, time and cost) and our expectations, in terms of the quality of delivery. As one side of the triangle cannot be changed without affecting the others, we will provide sufficient time and money, for each stage of the 'project', to ensure that, in addition to it being completed on time and on budget, it is completed safely and without harm to persons, property or the environment.

However, when we are the PD, we further understand and appreciate that we will be accepting specific duties, including "control" of the pre-construction phase and undertaking additional services, for which will require formal specific instruction, from the Client, to be covered by an "appropriate" professional fee, in order that we can ensure adequate resources and expertise, to discharge the duties.

Furthermore, as PD and under normal circumstances (i.e. our services are not dispensed with, before the completion of the project, whereupon the responsibility will fall to the PC or sole Contractor), we will also allocate sufficient resources to produce the **Health and Safety File (HSF – see separate document)**.

### Communication and co-operation

We will establish and / or require a high degree of communication and co-operation, between all duty holders, in order to deliver fully co-ordinated services.

Where we are the PD, we will liaise with the Client and PC or sole Contractor, throughout the project (unless our services are dispensed with, prior to completion), to ensure that all risks are effectively managed.

### Review

We will ensure that all design requirements are regularly and routinely reviewed, in liaison with all duty holders and respond, promptly, to any requests for advice and / or assistance in relation to design issues. This includes any communication with a Health and Safety Manager, Advisor or Consultant appointed by the Client, PC or sole Contractor.

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## CONTRACTOR PROCUREMENT AND CONTROL

### Policy statement

When we appoint Contractors we will ensure that they are '*competent*' to undertake the tasks required of them, in a safe and environmentally considerate manner.

Accordingly, we will always endeavour to select suitable Contractors, ensuring they have sufficient skills and knowledge to undertake the task(s) required of them, without unnecessary risk(s) to '*relevant persons*' or the environment.

We will liaise, with the Contractor(s), to consider any shared risks and provide the necessary information relating to any '*significant*' risks from our own activities and the controls we have in place, together with the instruction and training needed, for the Contractor(s) to ensure the safety of their staff and protection of the environment.

We will also oversee the work of Contractors and agree the nature of the controls that are needed, before work starts.

### Definitions

- 📖 **Contractor** – Any company, organisation or self-employed person engaged or appointed, under a contract for services (i.e. anyone who is NOT an employee), for a specific project or task.
- 📖 **Sub-contractor** – Any company, organisation or self-employed person engaged or appointed, by the contractor, for a specific project or task.
- 📖 **Construction work** – Any building, civil engineering or engineering construction work, including demolition and dismantling, refurbishment and site clearance and preparation but excluding site surveys.
- 📖 **Construction contract** – Although this term does now have a statutory definition, as the different types of contract are both numerous and varied, covering most but not all types of '*construction work*', further definitive information should be obtained from a legal practitioner.

### Primary statutory provisions (latest versions)

- 📖 **Management of Health and Safety at Work Regulations**
- 📖 **Construction (Design and Management) Regulations**
- 📖 **Regulatory Reform (Fire Safety) Order**
- 📖 **Control of Asbestos Regulations**
- 📖 **Control of Substances Hazardous To Health Regulations**
- 📖 **Electricity at Work Regulations**
- 📖 **Gas Safety (Installation and Use) Regulations**
- 📖 **Work at Height Regulations**

*Note: This list is not exhaustive*

### Assessment (generic) and provision of Contractor procurement procedures

We recognise that Contractors are a crucial part of our activities, particularly in relation to delivering specialist and flexible services for new build and refurbishment projects, as well as on-going maintenance, although we also use Contractors to deliver other non-core support services.

We understand that using Contractors brings with it some inherent issues, including selection, quality control and supervision, especially as we also understand that we may still be liable for incidents caused by or involving Contractors and it is therefore essential that we get this right.

Accordingly, Contractor procurement is both a strategic responsibility, to ensure that work is commissioned appropriately and operational, to ensure that it is delivered safely. We aim, therefore, to conform to good practice and expect all members of staff to consider the following checklist, for all Contractors, prior to engaging with them:

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<b>Contractor procurement checklist</b>		✓
<input type="checkbox"/> Have we included the SHEF implications of the work in the job specification?		
<input type="checkbox"/> Have we made enquiries about the competence of the Contractor? If so, have we checked for evidence before they get the job?		
<input type="checkbox"/> Have we assessed the risk(s) of the work and agreed action(s) to control the risk(s) with the Contractor?		
<input type="checkbox"/> Have we provided the Contractor and their employees and/or sub-Contractors with information about the risk(s)?		
<input type="checkbox"/> Have we provided the Contractor and their employees and/or sub-Contractors with our emergency procedures?		
<input type="checkbox"/> Have we provided instructions, information and training for our staff, in relation to any additional risk(s) from the Contractors' activities?		
<input type="checkbox"/> Have we put in place arrangements, with the Contractor, to co-ordinate their and our activities during the work?		
<input type="checkbox"/> Have we consulted our own members of staff about the work being undertaken and how they can raise any concerns?		
<input type="checkbox"/> Have we identified who will be responsible for the work being undertaken and what we expect them to do?		
<input type="checkbox"/> Have we identified who will supervise the work and how?		
<input type="checkbox"/> Have we put in place arrangements to keep a check on how the work is going against what we have agreed with the Contractor?		
<input type="checkbox"/> Have we agreed how the job will be reviewed to learn any lessons from it?		

However, when it comes to *'construction work'*, we need to comply, additionally and / or specifically, with the requirements of the Construction (Design and Management) Regulations (see separate procedure document, in relation to Principal Designer duties and responsibilities, other than procurement).

### **Construction work**

Regardless of type, at the root of any *'construction contract'*, lies the contractual method of procurement, by which the *'construction work'*, or project, is set up and established.

There are four common methods of construction procurement used in the UK, being *'traditional'*, *'design and build (D&B)'*, *'management contracting'* or *'construction (direct) management'* and the impact of the method chosen is seen in the appointment of the 'professional team' and types of sub-contract used.

However, before contracts are considered and appointment(s) made, it is necessary to ensure that the Contractor(s) being considered is *'competent'* and has made adequate SHEF provision.

Accordingly, we will adopt the following procedure, in relation to *'construction work'*, only:



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- ❖ Notify the SHEF Advisors of any / all new project(s), at the conception stage, in order that the strategic project risk(s) can be considered, for inclusion with the [pre-construction information \(PCI – see appendix\)](#) pack.
- ❖ Our SHEF Advisors will ensure that any proposed new Contractors are evaluated as necessary (i.e. dependent on the nature of the services offered), in accordance with the responses to a [pre-qualification questionnaire \(PQQ – see appendix\)](#), with the results included on the Approved Suppliers / Contractors database, as 'awaiting final approval'.
- ❖ As soon as the Contractor has received 'preliminary approval' they will then be subjected to further evaluation, in relation to both financial standing and technical ability and updated to 'approved' status.
- ❖ Issue the PCI to the 'approved Contractor', chosen from the database, to act as 'Principal Designer (PD)', to determine the necessary SHEF issues for the design phase and incorporation into a detailed 'tender specification' and / or 'schedule of works'.
- ❖ Appoint the 'approved Contractor', chosen from the database, using the most appropriate procurement method (i.e. taking account of the size and nature of the project), to act as a 'Principal Contractor (PC)' and formulate a construction phase plan (CPP).
- ❖ Prior to the commencement of the project, the SHEF Advisors will approve, on our behalf, the CPP, fire risk assessment (FRA) and construction phase fire plan (CPFP).

### Control arrangements (post appointment)

#### ❖ Monitoring

- ❖ **Construction work** – Regular but unannounced site inspections will be undertaken, by the SHEF Advisors, based on a schedule provided by the Person(s) responsible for SHEF management.
- ❖ **Non-construction activity** – The Person(s) responsible for SHEF management will undertake regular and unannounced inspections of all contracts within their control, after notifying the Contractor that their work will be monitored. This will include operational processes and documentation (e.g. policy and procedures, including risk assessments and method statements etc.).

**Note:** Any serious deficiencies and / or dangerous practices must be raised with the Contractors' senior representative, on site, in the first instance and then confirmed, in writing, to the Director responsible for SHEF compliance and the 'Responsible Person' representing the Contractor, without delay.

#### ❖ Permitting

- ❖ A 'Permit to Work' (PtW) is a formal extension of the SMS that is used to control higher risk activities. It enables an activity-specific assessment of risk(s) to be made and to specify control measures that will be put in place in order to minimise the risk.
- ❖ **Construction work** – During the construction phase of 'construction work' the PC will be responsible for the permitting arrangements.
- ❖ **Non-construction activity** – The PtW will be under the control of the most senior 'competent person' present, representing our interest(s), at the premises / site (e.g. Building Manager, Security Officer or Receptionist) and is necessary for certain maintenance activities, particularly in relation to:
  - ❖ Working at height (e.g. on roofs etc.).
  - ❖ Working in confined spaces (e.g. ducts etc.).
  - ❖ Hot work (e.g. welding, soldering or cutting using hot flame techniques).
  - ❖ Isolation of or modification to safety systems (e.g. fire alarms etc.).
  - ❖ Live working on electricity supply systems.
  - ❖ Work involving interaction with asbestos containing material (ACM)

The procedure to be adopted for all non-construction activity is, as follows:

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- ❖ The Contractor is required to provide a risk assessment and method statement (RA / MS) relating to the work activity, prior to any work starting.
- ❖ Our most senior 'competent person' present will refer the RA / MS to one of the Person(s) responsible for SHEF management, who may also refer it to our SHEF Advisors, in order to ensure that the work does not overlap with any other work and agree, or otherwise, for the PtW to be issued.
- ❖ The 'competent person' will then complete the [Permit to Work Form \(see appendix\)](#), attach a copy of the RA / MS and return it all to the Contractor.
- ❖ The Contractor is then required to display the form, together with the RA / MS in a prominent position, close to the work activity, for all 'relevant persons' to see and be aware of any conditions and / or restrictions that are part of the PtW.
- ❖ Once the work activity has finished, or after any delay specified on the PtW, the form must be handed back to the 'competent person', for sign-off, to allow the area to be cleared of all permit-related hazards.
- ❖ All completed PtW forms will be maintained in a file, maintained and kept at the premises, for monitoring by the SHEF Advisor.

**The intention of the permit to work is to:**

- ❖ Ensure that the work, which is intended to take place, is properly authorized.
- ❖ Clarify the nature and extent of the work.
- ❖ Specify which precautions must be taken and which activities are prohibited.

**Note:** Consideration should also be taken of the activities of other parties that may impact on, or be affected by, the proposed work, which may need to be temporarily suspended or modified.

- ❖ Indicate the date, time and location that the specified activities may occur.
- ❖ Ensure that all those persons who have control of, or are affected by, the activity are aware.
- ❖ Provide a record of the work, that the specified precautions have been understood and implemented and that all workplace and / or equipment is returned to a safe condition.

❖ **Contractor information**

- ❖ **Safety rules** – All Contractors will receive a copy of the [Safety Rules for all Contractors \(see appendix\)](#) when they first attend the premises or site, in the form of either a formal 'construction work' induction or specific hazards briefing.

- ❖ **Method Statement (micro Contractors only)** – It is acknowledged that some Contractors are sole traders or have less than 5 employees and accordingly, a simple [Method Statement \(see appendix\)](#) has been provided, for their use, which should be completed and returned, to one of the Person(s) responsible for SHEF management, prior to work commencing.

**Note:** The aim is to encourage safe working practices and not to stop micro Contractors from working for us and help in completing the document will be made available to them, upon request.

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## DISPLAY SCREEN EQUIPMENT (DSE)

### Policy statement

We understand and acknowledge that a number of health hazards may arise from the 'use' of this type of equipment, which includes both conventional display screens, as well as laptops, touch-screens and similar devices.

Accordingly, we will ensure that any 'significant' risks are reduced to a minimum.

### Definitions

- 📦 **DSE** – Any alphanumeric or graphic display, regardless of the process involved
- 📦 **Use** – Any use in connection with work activity
- 📦 **User** – An employee who uses DSE for a 'significant' part of their work
- 📦 **Workstation** – An assembly comprising:
  - 📦 DSE, with or without software and an input device (e.g. keyboard and / or mouse);
  - 📦 optional accessories and / or peripheral items (e.g. desk, chair, printer etc.); and
  - 📦 the immediately surrounding work environment.

### Primary statutory provisions (latest versions)

- 📦 **Management of Health and Safety at Work Regulations**
- 📦 **Health and Safety (Display Screen Equipment) Regulations**

### Assessment (generic) and provision of DSE procedures

Computer workstations or equipment can be associated with neck, shoulder, back or arm pain and surveys have found that a high proportion of DSE workers report aches, pains, fatigue and / or eyestrain or discomfort.

These aches and pains are known as work-related upper limb disorders (WRULDs), which can include a range of medical conditions, such as repetitive strain injury (RSI), although most of these conditions do not constitute serious ill health.

DSE work is not high risk but it certainly makes sense to avoid the potential associated medical conditions, as far as possible.

### Safe use of DSE

WRULD can be avoided if users adopt good practice, by setting up their workstation(s) properly and taking breaks during prolonged use. A separate [DSE users information sheet \(see appendix\)](#) is provided, which should be retained by all users, for personal reference.

### Self-assessment

As a first step, to ensuring that users feel comfortable, at their workstation, a [DSE Self-assessment Form \(see appendix\)](#) is provided, which should be completed, by all new starters and returned to the Person(s) responsible for SHEF management, within 2 weeks of starting work.

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## DRIVING AND THE USE OF MOBILE PHONES

### Policy statement

We recognise that although our primary responsibility is for the health and safety of our staff, while engaged in driving at work, we also have a duty of care for other road users and members of the public who could be put at risk by work related driving activities.

Accordingly, our arrangements for the control of work-related driving are intended to ensure compliance with all relevant SHEF and road traffic legislation and good practice. In addition, we recognise that environmental impact and sustainability are important considerations, with respect to work-related travel, generally and these issues will be considered as part of the assessment for any journey undertaken.

### Definitions

- 📌 **Driving** – Using any mechanically and / or electrically propelled vehicle, during the course of work activity
- 📌 **Hand-held device** – Anything that is, or must be, held at some point during the course of making or receiving a call, or performing any other interactive communication function

### Primary statutory provisions (latest versions)

- 📌 **Management of Health and Safety at Work Regulations**
- 📌 **Road Traffic Act**
- 📌 **Road Vehicles (Construction and Use) Regulations**

### Assessment (generic) and provision of work-related driving procedures

More than a quarter of all road traffic incidents are understood to involve somebody who is driving as part of their work, at the time. In the UK this equates to 1,000 fatalities and up to 13,000 serious injuries every year.

Although clear legal duties have existed for some time, under both health and safety and road traffic laws, the introduction of Corporate Manslaughter legislation has highlighted the need to specifically address driving at work. By definition, however, with the exception of road traffic law, these corporate duties do not apply to commuting, unless travelling from home to somewhere that is not the usual place of work.

Accordingly, as health and safety law applies to all work activities, including driving, we aim to manage the risks to drivers as part of our normal health and safety arrangements.

### Safe driver

- 📌 A full current and valid UK driving licence is required, prior to any work-related driving
- 📌 Drivers should:
  - 📌 obey the Highway Code and follow safe driving practices, at all times
  - 📌 ensure the safety and welfare of passengers, including the wearing of seat belts
  - 📌 ensure the vehicle is roadworthy and fully insured (i.e. Class 1 use)
  - 📌 allocate plenty of time to undertake a journey safely
  - 📌 take regular rest breaks, particularly if driving long distances (i.e. in excess of two hours)
  - 📌 subscribe to a breakdown membership and ensure the membership card and / or contact details are readily available, in case of breakdown
  - 📌 report any road traffic incident, including any near miss to the Person responsible for SHEF management, at the earliest opportunity
- 📌 Drivers should not:
  - 📌 drive when they are:
    - 📌 tired, feeling unwell or taking any medication that might induce drowsiness (e.g. piriton etc.)
    - 📌 under the influence of drugs or alcohol
    - 📌 use a mobile phone whilst driving, unless using a legally approved hands free kit and only then to make or receive short (i.e. non-technical) calls
    - 📌 keep registration, MOT, or insurance documentation in the vehicle
    - 📌 keep or leave valuable items on view in the vehicle
    - 📌 pick up hitch-hikers
    - 📌 leave a vehicle parked in a unlit area, especially when returning to it after dark

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### Safe vehicle

We will endeavour to ensure that no vehicle will be used for work purposes, unless it is:

- ▣ the most suitable for the task
- ▣ fitted, where appropriate, with any necessary driver aids and / or safety devices
- ▣ routinely serviced, in accordance with the manufacturer's recommendations
- ▣ routinely checked (i.e. lights, tyres and fluid levels etc.), by the driver(s)
- ▣ insured appropriately (i.e. Class 1 use)
- ▣ provided with a valid MOT certificate, if over 3 years old

### Safe journey

Long driving journeys will be avoided, where possible, with public transport being the preferred option where journey times are expected to be longer than two hours, or during peak traffic flow, or overnight.

We do not condone risk-taking and expect drivers to adjust their route(s) and / or journey time(s) to take account of poor weather conditions.

### Use of hands-free devices while driving

Hands-free phones, satellite navigation systems and 2-way radios can be used when driving, or riding. However, if the police think a driver or rider is distracted and / or not in control of the vehicle they could still get stopped and penalised, or prosecuted for driving without due care and consideration for other road users.

Accordingly, even hands-free devices can still only be used 'safely' when parked, or if calling either 999 or 112, in an emergency and it is unsafe or impractical to stop.

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## ELECTRICAL AND GAS SAFETY

### Policy statement

We recognise that electricity and gas are highly beneficial commodities when used correctly but can also kill or severely injure people and cause property damage, when not installed, maintained or used properly.

Accordingly, our arrangements for the control of both electrical and gas installations and appliances are intended to significantly reduce the risk of injury and / or damage and so far as is reasonably practicable, be maintained to prevent danger.

The implementation of this policy requires the total co-operation of all staff, visitors and all / any contractors instructed to carry out work on, or use, electrical and gas installations and / or equipment.

### Definitions

- 📌 **Electrical installation** – An assembly of associated electrical equipment, supplied from a common origin, to fulfil a specific purpose and having certain coordinated characteristics
- 📌 **Gas appliance** – Any appliance designed for use by a consumer of gas for heating, lighting, cooking and other purposes, including any portable and / or mobile space heaters supplied with gas from a cylinder. Pipes supplying the gas, primary and secondary meters, valves, regulators and flues etc. and appliances are defined, collectively, as '**gas fittings**'.
- 📌 **Gas Safe** – The official register of gas engineers who are qualified to work safely and legally on gas appliances. This has now replaced 'CORGI' registration.
- 📌 **NICEIC** – National Inspection Council for Electrical Installation Contracting
- 📌 **PAT** – Portable (*electrical*) appliance testing
- 📌 **Portable (electrical) appliance** – Any electrical equipment that is, or may be, connected to an electricity supply via a plug and socket

### Primary statutory provisions (latest versions)

- 📌 **Management of Health and Safety at Work Regulations**
- 📌 **Electricity at Work Regulations**
- 📌 **Institution of Engineering and Technology (IET) Wiring Regulations**
- 📌 **Gas (Safety) Regulations**
- 📌 **Gas Safety (Installation and Use) Regulations**

### Assessment (generic) and provision of electrical and gas safety procedures

The main hazards associated with electricity are:

- 📌 electric shock and burns, from contact with live parts
- 📌 injury from exposure to arcing, fire from faulty electrical equipment or installations
- 📌 explosion, caused by unsuitable electrical apparatus or static electricity igniting flammable vapours or dusts, for example in a spray paint booth

Electric shocks can also lead to other types of injury, for example by causing a fall from ladders or scaffolds etc.

The main hazards associated with gas are:

- 📌 leaks, from faulty gas appliances and / or fittings
- 📌 production of poisonous fumes, in the form of carbon monoxide, that can cause kill very quickly, without any warning or cause serious long-term health problems, such as brain damage
- 📌 explosion, caused by the accidental ignition of the highly combustible unburned gas

### Maintenance of electrical installations and equipment

The Person(s) responsible for SHEF management will ensure that:

- 📌 all electrical installations and equipment are suitable for purpose
- 📌 all electrical installations are tested every 5 years, by NICEIC approved electrical contractors
- 📌 all portable electrical appliances are routine checked and where necessary, subjected to a PAT inspection regime
- 📌 there is a fault reporting system in place and that a suitably qualified, '*competent*', person is used to repair electrical installations and / or equipment
- 📌 suitable records of inspections and tests are kept, for a minimum of 3 years

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### Maintenance of gas appliances

The Person(s) responsible for SHEF management will ensure that:

- ▣ all gas appliances and fittings are suitable for purpose and adequately ventilated
- ▣ all gas appliances are tested annually, by a Gas Safe registered person
- ▣ all tenants are provided with a copy of the annual safety check, immediately after commencement of the lease and within 28 days of the check
- ▣ suitable records of inspections and tests are kept, for a minimum of 3 years

### Staff responsibilities

In relation to electrical safety, staff should:

- ▣ visually inspect all electrical equipment prior to use
- ▣ report any defect(s) or concern(s) to the Person responsible for SHEF management, immediately
- ▣ mark any equipment found to be faulty and remove it from service

In relation to gas safety, staff should:

- ▣ leave gas appliances alone and never tamper with any fittings, other than controls intended for use by staff or tenants to regulate temperature etc.
- ▣ in the event of a suspected leak, immediately turn off the supply and call the national gas emergency number (0800 111 999)
- ▣ if in any doubt, evacuate the building and call the police
- ▣ under no circumstances, ever turn the gas supply back on, until after a suspected leak has been dealt with, by a Gas Safe registered person

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## ENVIRONMENTAL ISSUES

### Policy statement

We are fully committed to protecting the environment and are continually looking for new ways to improve the environmental performance of all our activities.

### Definitions

- 📖 **Environment** – The global ecological surroundings, consisting of land, water and air. This includes the air within buildings and other natural or man-made structures, above or below ground, as well as natural resources and flora and fauna.
- 📖 **Environmental aspects** – An item or activity (i.e. products or services etc.) that interacts with the environment and which can have an environmental impact.
- 📖 **Environmental impacts** – Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an environmental aspect.
- 📖 **Harm** – To cause injury, damage or suffering to living organisms or any interference with the ecological systems (environment) of which they form part.
- 📖 **Pollution** – Harm to the environment, due to the release or disposal of any substance.
- 📖 **Process** – any activities, whether in or on premises, or by means of mobile plant, which are capable of causing pollution of the environment, including any 'prescribed' process.

### Primary statutory provisions (latest versions)

- 📖 **Environmental Protection Act**
- 📖 **Environmental Protection Regulations**
- 📖 **Control of Pollution Act**
- 📖 **Pollution Prevention and Control Regulations**
- 📖 **Environmental Noise Regulations**
- 📖 **Waste Regulations**
- 📖 **Hazardous Waste Regulations**
- 📖 **Waste Management Regulations**
- 📖 **Site Waste Management Plans Regulations**
- 📖 **Waste Electrical and Electronic Equipment Regulations**
- 📖 **Town and Country Planning Regulations**
- 📖 **Public Rights of Way Regulations**
- 📖 **Environmental Impact Assessment and Natural Habitats Regulations**

### Assessment (generic) and provision of environmental procedures

Environmental risk can have serious negative effects on our financial well-being and ability to achieve our business objectives, especially when considering our construction activities. Existing (the above list is NOT exhaustive) and forthcoming legislation, as well as governance and the accounting trends of environmental risk and liability, is likely to present an increasing influence on our financial performance, reputation and brand, cash flow and shareholder value.

In addition, the Companies Act requires us to include an environmental statement in our Annual Report to Shareholders and accordingly, we will need to state, categorically, that we are conscious of environmental issues and both keen and able to achieve our environmental objectives.

### General code of good practice

With respect to our activities and the properties that we own and occupy, we will ensure, so far as is reasonably practicable, that:

- 📖 the premises are 'low energy', to reduce the emission of gases which are known to contribute to the greenhouse effect (e.g. carbon monoxide etc.), by using energy-efficient heating installations.
- 📖 the premises, installations and materials used have been, or will be, constructed, maintained and altered without the use of CFCs and HCFCs, which can escape and damage the ozone layer.
- 📖 waste materials are recycled, in particular waste paper and hazardous waste (e.g. paint tins etc.), are disposed of safely.
- 📖 cleaning materials which are harmful to the environment are not used.
- 📖 appropriate consideration is given to the procurement, use and effective maintenance of vehicles, to ensure that they are fuel efficient and minimise exhaust emissions.
- 📖 other supplies and practices are not harmful to the environment, wherever reasonably possible.

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Accordingly, we will endeavour, so far as is reasonably practicable (i.e. given the constraints imposed by the scope of the project and / or the expressed concerns of the other parties) to encourage and / or assist in the implementation of the following measures by the party or parties involved:

- ❖ Where required by legislation, we will commission a comprehensive Environmental Impact Assessment (EIA), based on the [environmental aspects and impacts procedure \(see appendix\)](#) and all appropriate control measures will be implemented, so far as is reasonably practicable.
- ❖ Inclusion of appropriate clauses in tender and contract documents, to ensure the effective monitoring and control of environmental issues during the construction phase, on all projects, based on the [environmental issues \(schedule\) in property development and construction \(see appendix\)](#).
- ❖ Designing energy efficient buildings, to reduce greenhouse gases.
- ❖ Preventing the use of ozone-damaging CFCs and HCFCs in building materials utilised.
- ❖ Designing buildings, where possible, to be naturally ventilated, avoiding air conditioning which generates carbon dioxide emissions and the use of CFCs and HCFCs which can escape and damage the ozone layer.
- ❖ Assisting others to improve their environmental standards, including tenants.
- ❖ Undertake appropriate energy audit measures, on new and existing buildings, for example the BRE Environmental Assessments Method (BREEAM) for assessing the environmental impact of existing and new buildings

We are fully aware of the range of opportunities available, for reducing environmental harm, arising from both the development and the construction processes and the subsequent operation of buildings. With the exception of those measures required to comply with our statutory duties, many of these opportunities are optional and whilst some may result in reduced capital and / or revenue expenditure, others may result in significant increases in cost and will clearly be subject to detailed cost / benefit considerations.

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## EQUALITY, DISABILITY AND DIVERSITY ISSUES

### Policy statement

We welcome diversity amongst our staff, contractors and visitors, recognising the contributions that can be made by all individuals and aim to provide an inclusive and accessible working environment, in which the rights and dignity of all persons are respected and will strive to remove any barriers that might deter people from reaching their full potential.

We are committed to promoting equality of opportunity, eliminating unlawful discrimination and harassment, promoting positive attitudes and encouraging participation and taking steps to meet the needs of disabled people, including, where necessary, by more favourable treatment.

Any unlawful discriminatory behaviour, including harassment or bullying, by individuals or groups, will be regarded extremely seriously and could be regarded as grounds for disciplinary action, which may, ultimately, include dismissal.

### Definitions

- 📌 **Disability** – A person has a disability, in accordance with the relevant statutory provision(s), if they have a physical or mental impairment, which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.
- 📌 **Discrimination** – This occurs where:
  - 📌 a person with a disability is treated less favorably than others, to whom the reason does not, or would not, apply to them;
  - 📌 for a reason that relates to the person's disability;
  - 📌 without justification
- 📌 **Reasonable adjustment** – Both 'employers' and 'service providers' are required to make 'reasonable adjustments' to premises, workplaces and tasks for disabled workers, to ensure that disabled people have equal opportunities in accessing premises and applying for and staying in work, which may also be made on a temporary basis.

### Primary statutory provisions (latest versions)

- 📌 **Equality Act**
- 📌 **Data protection Act**
- 📌 **Management of Health and Safety at Work Regulations**
- 📌 **Workplace (Health, Safety and Welfare) Regulations**

### Assessment (generic) and provision of equality procedures

Equality can be described as breaking down barriers, eliminating discrimination and ensuring equal opportunity and access for all groups, to goods and services and in employment; the basis of which is supported and protected by legislation, with regard to these nine 'protected' characteristics:

- 📌 age;
- 📌 disability;
- 📌 gender reassignment;
- 📌 marriage and civil partnership;
- 📌 pregnancy and maternity;
- 📌 race (includes colour, nationality and ethnic origins);
- 📌 religion and or belief;
- 📌 sex;
- 📌 sexual orientation;

Diversity can be described as celebrating differences and valuing everyone. Each person is an individual with both visible and non-visible differences and by respecting this, everyone can feel valued for their contributions.

Equality and Diversity are not inter-changeable but inter-dependent and there can be no equality of opportunity if differences are not valued and harnessed.

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## Practical support

When considering the 'reasonable adjustments' that may be required, the following may be of assistance:

### Do's ...

- ❖ Involve the disabled person – appreciate the skills and insight they may have to find the best outcome
- ❖ Work together, if it is necessary to assess whether a disability affects health and safety and, if so, to what extent. In other words, undertake risk assessments, together and consider the effects of the person's disability when thinking about the 'reasonable adjustments' needed
- ❖ Take account of any adjustments already in place, so your conclusions are based on any remaining risks, if they exist
- ❖ Make new 'reasonable adjustments' to overcome remaining risks, remembering to work with the disabled person to tailor the adjustments to their needs
- ❖ Be sensitive and timely to support the disabled person and avoid delays. Where delay can't be helped, make short-term, temporary, arrangements so they are not disadvantaged
- ❖ Involve others, such as specialists (e.g. Disability Employment Advisors, Occupational Health or the employee's representative or advocate), if you need to gain a better understanding. Many disabled people are experts in their disability, but others, for instance people with certain learning disabilities or people new to a long-term health condition, may be less familiar.
- ❖ Share with the disabled person (and their representative, if they have one) any specialist information to give them a say in its contribution to the assessment
- ❖ Make sure you can give good reasons for decisions you make about how to manage health and safety risks in relation to a disabled person or you may be discriminating.
- ❖ Allow disabled people to feel comfortable talking about their disability
- ❖ Be sensible. Remember our lives can never be free from risks and for disabled people, overcoming them can be harder. This doesn't mean being overly protective. You should enable disabled people to enter and stay in work. So check with the person that workplace adjustments are actually helping and are not a hindrance.

### Don'ts ...

- ❖ Don't make assumptions about the health and safety implications of a person's disability as it might not make a difference to workplace risks. If you do a risk assessment with no good reason you might discriminate illegally.
- ❖ Don't have 'blanket' policies that treat disabled people differently. For instance, a ban on applicants with, say, epilepsy, diabetes or mental health problems is likely to be direct discrimination. Be aware that disabilities often affect people in very individual ways;
- ❖ Don't have unnecessary criteria for a job, e.g. the need for a Group 2 driving license when a Group 1 license would do. This could unfairly discriminate
- ❖ Don't insist on employees revealing details of their disability as they too have rights to confidentiality (see below). However, they also have health and safety responsibilities, so may have to tell you about the consequences of a condition if there are health and safety effects. Then they can work with you on 'reasonable adjustments'.

In addition, a [Personal Emergency Evacuation Plan \(see appendix\)](#) may be required, which is also referred to in a separate procedure, entitled Fire Safety, which should be read in conjunction with this policy.

## Confidentiality

- ❖ **Revealing a disability** - If a disabled person expects an employer to make a reasonable adjustment, they will need to provide the employer with enough information to carry out that adjustment. Disabled people have a right to confidentiality and an employer must not disclose confidential details about them without their explicit consent.
- ❖ **Data protection** - **The Data Protection Act** places duties on employers to ensure confidential and appropriate handling of 'sensitive personal data', which includes data about a person's health. It also gives individuals the right to see personal data and information held or processed about them, provided they request it in writing. This provision is important in accessing personal information relating to a risk assessment.

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## EXPECTANT AND NURSING MOTHERS

### Policy statement

We recognise that pregnancy is part of everyday life and should not be regarded as ill health, with any SHEF implications being adequately addressed by our normal management procedures.

However, although many women work while they are pregnant and may even return to work while they are still breastfeeding, some workplace hazards and / or working conditions, normally considered acceptable, may no longer be so.

We also appreciate that, in most cases, pregnancy usually goes undetected for the first 4-6 weeks and accordingly, we feel that it is important to identify hazards and risks for all female employees of childbearing age.

We will also take into account that some hazards can present more of a risk at different stages of pregnancy.

### Definitions

- ☒ **Expectant or nursing mother** – An employee who is pregnant, has given birth within the previous six months or who is breastfeeding
- ☒ **Given birth** – Delivered a living child or, after 24 weeks of pregnancy, a stillborn child

### Primary statutory provisions (latest versions)

- ☒ **Management of Health and Safety at Work Regulations**
- ☒ **Workplace (Health, Safety and Welfare) Regulations**
- ☒ **Equality Act**

### Assessment (generic) and provision of expectant and nursing mother procedures

The main hazards associated with expectant or nursing mothers, as well as, potentially, her unborn baby or babies, include (but not limited to) the following:

- ☒ **Physical agents** – including:
  - ☒ Manual handling, movement(s) and posture(s)
  - ☒ Noise, vibration and shocks
  - ☒ Radiation (ionising and non-ionising)
- ☒ **Biological agents** – including:
  - ☒ Infectious diseases
- ☒ **Chemical agents** – including
  - ☒ Toxic chemicals and cytotoxic (antimitotic) drugs
  - ☒ Heavy metals, such as lead and mercury etc.
  - ☒ Carbon monoxide
- ☒ **Working conditions** – including:
  - ☒ Facilities, including rest rooms
  - ☒ Travelling and working alone
  - ☒ Working hours, mental or physical fatigue and stress

### Safe system of work

We will take all reasonable steps to safeguard the health, safety and welfare of expectant and / or nursing mothers, including the provision of information, instruction and training, to enable them to work safely and without risks to their health or the health of their baby or babies.

### Notification of pregnancy

When an employee notifies the Person responsible for SHEF management that she is pregnant, a second stage (i.e. person-specific) [Pregnant Worker Risk Assessment \(see appendix\)](#) will be undertaken, based on the individual circumstances and any medical advice received.

As pregnancy is not a static condition, both the nature and degree of risk could change as the pregnancy develops. Accordingly, we will take into account any physiological changes that may occur during pregnancy, some of which could be:

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- 📌 Morning sickness
- 📌 Backache, which is likely to become increasingly significant as the pregnancy advances
- 📌 Haemorrhoids and varicose veins
- 📌 Increasing physical size, which can affect co-ordination, mobility and dexterity and the amount of workspace necessary to work comfortably
- 📌 Increasing toilet requirements
- 📌 Increasing tiredness

**Increased risk**

If the risk is found to go beyond that found outside the workplace, we would consider the following actions to eliminate or reduce the risk:

- 📌 In the first instance, we will alter the hours of work and / or working conditions, where it is reasonable to do so, in order to avoid the risks identified
- 📌 If these alternatives are not feasible, or would not avoid or sufficiently reduce the risks, then we will offer suitable alternative work, at the same rate of pay
- 📌 In situations where suitable alternative work is not appropriate or available, we will have no alternative but to suspend the expectant or nursing mother, on paid leave, for as long as is necessary, for her own protection and that of her baby or babies.

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## FIRE SAFETY

### Policy statement

We recognise that fire, even a small outbreak, has the potential to become a major threat to people using our buildings, creating risk(s) to both life and property, as well as damage to the environment and may also compromise our normal business activities and reputation.

Accordingly, we are committed to managing the risk, by providing a fire safety framework, incorporating structural protection, fire safety systems and operational procedures, which will be robustly implemented to secure the safety of all *'relevant persons'* and to protect our assets.

### Definitions

- 📖 **General fire precautions** – Measures to reduce the risk of fire and its spread; means of escape and it's protection; fire detection and warning; fire-fighting arrangements; fire instruction and training; and measures to mitigate the effects of the fire
- 📖 **Preventive and protective measures** – The measures, identified by the responsible person following a fire risk assessment, as the general fire precautions needed, to comply with the requirements of the Fire Safety Order
- 📖 **Relevant persons** – Any person (including the responsible person) who is or may be lawfully on, or in the immediate vicinity of, the premises who is at risk from a fire on the premises but does not include an operational fire-fighter, while fire-fighting
- 📖 **Responsible person** – An employer, in relation to any workplace under their control, or otherwise, the person in control of a premises or the owner of a premises

### Primary statutory provisions (latest versions)

- 📖 **Regulatory Reform (Fire Safety) Order**
- 📖 **Dangerous Substances and Explosive Atmospheres Regulations**
- 📖 **Highly Flammable Liquid and Liquefied Petroleum Gases Regulations**
- 📖 **Building Act and Building Regulations**

### Assessment (generic) and provision of fire safety procedures

Fire is one of the most devastating of all hazards and our primary focus will always be on the *'prevention'* of any outbreak and then, to mitigate the direct and consequential harm and / or damage arising from an outbreak, by providing and maintaining appropriate *'general fire precautions'*. These *'preventive and protective measures'* will be appropriate to the building use and occupancy, the inherent fire risk(s), as identified by a ***'premises-specific fire risk assessment (FRA)'*** and our legal obligation(s) as an employer, owner and / or controller of premises.

In relation to any new construction and / or major refurbishment of existing premises, the Local Authority (LA) Building Control Officer (BCO) or alternatively, a privately instructed Appointed Inspector (AI), will responsible for applying the *'functional requirements'* of the Building Regulations, through Approved Documents (e.g. Part B, volumes 1 & 2 and Part M etc.) and the relevant British Standards (e.g. BS 9999, BS 5839 etc.).

The following procedures have, therefore, been developed for the purpose of identifying, accessing, reviewing and communicating both statutory and non-statutory (good practice) requirements.

### Scope

These procedures are designed to cover those aspects that we can control and directly manage, as well as those we do not but over which we can be expected to have an influence and where appropriate, will be detailed in a premises / site fire safety plan.

The requirements extend to all employees and other *'relevant persons'*, including tenants and any contractors, who will have been carefully selected and approved, to ensure that they work to the requirements of this policy.

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## Objectives

Our buildings and / or premises, including the fire safety systems in them, will be maintained and procedures implemented so that, in the event of fire, all *'relevant persons'* are protected from harm and able, ultimately, should the need arise, to reach a place of safety. In order to do this, our specific objectives are to:

- ▣ provide appropriate fire safety management systems and procedures
- ▣ allocate responsibilities, duties and standards for:
  - ▣ fire safety management, incorporating the principles of prevention, active and passive protection and emergency response;
  - ▣ the provision, installation, testing and planned maintenance of fire safety equipment, devices, alarm and extinguishing systems;
  - ▣ the implementation of fire emergency plans including evacuation procedures, first-aid fire fighting, contacting the emergency services, emergency co-ordination, staff training;
  - ▣ monitoring and auditing all fire safety management systems and procedures;
- ▣ identify, by risk assessment, standards for:
  - ▣ means of escape, fire alarm and extinguishing systems in our premises, consistent with occupation and use, to achieve safe evacuation;
  - ▣ the control of combustible, flammable and / or explosive materials;
- ▣ develop and implement:
  - ▣ suitable staff training in fire safety awareness and management;
  - ▣ emergency procedures to ensure early recovery from an unforeseen incident involving fire, in order to maximise safety, minimise harm and enable operations to continue

Achieving these objectives will ensure compliance with fire safety and related legislation, as well as our on-going desire to implement good practice.

## Fire prevention

Fires need three things to start: a source of ignition (heat energy), a source of fuel (something that burns) and oxygen:

- ▣ **sources of ignition** include heaters, lighting, naked flames, electrical equipment, smokers' materials (cigarettes, matches etc.), and anything else that can get very hot or cause sparks
- ▣ **sources of fuel** include:
  - ▣ **combustible solids** (e.g. wood, paper, plastic, rubber or foam, loose packaging materials, waste rubbish and furniture); and
  - ▣ **flammable liquids** (e.g. petrol, acetone etc.), **flammable gases** (e.g. methane, acetylene etc.) and **liquefiable solids** (e.g. fats, candles etc.)
- ▣ **sources of oxygen** include the air around us and any oxygenation processes
- ▣ Oxygen supplies can be controlled, in some instances but the general approach to the prevention of fire is, quite simply, to keep sources of fuel away from sources of ignition, for long enough to prevent the combustible and / or flammable material(s) from reaching the point where ignitable vapours are produced.
- ▣ **Security arrangements** should also be actively considered, in relation to deliberate fire setting (i.e. arson), as this is the primary cause of more than half of all reported fires.

## Authority, roles, responsibility and resources

The ultimate legal responsibility for ensuring compliance with fire safety and related legislation lies with the Board, as *'Responsible person'*, being the *'employing authority'* and corporate responsibilities fall solely on them but may also fall, jointly, with other *'employing authorities'* and / or *'landlords'*, in shared premises. The **Director responsible for SHEF compliance** has primary responsibility, acting on behalf of the Board, for establishing, operating and maintaining the fire safety management system and will ensure that sufficient resources are requested, provided and maintained for the effective implementation and control of the fire safety management system, including:

- ▣ financial resources
- ▣ human resources
- ▣ training and personal development services
- ▣ technical and informational services
- ▣ specialty services, including auditing

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The Head of Finance will ensure that:

- ▣ funding, for capital and revenue expenditure, including planned maintenance, is identified, allocated and provided, in a timely manner, consistent with this policy and agreed corporate annual budget provisions.

The Director responsible for SHEF compliance will also ensure that:

- ▣ consultation takes place with the planning authorities, should any new build be considered and / or any proposed work to any of our premises results in a 'material' change of use, number of occupants or means of escape
- ▣ fire safety specifications, in the form of a **Fire Safety Strategy** (see appendix) document, are incorporated in the planning of any new build, major refurbishment and / or structural alteration project(s), in consultation with the BCO or AI and in liaison with the 'competent' SHEF advisors, where appropriate;
- ▣ **FRA inspections** are undertaken, for all of our property, including those which are vacant but excluding those undergoing refurbishment (i.e. fire safety management becomes the responsibility of the Contractor or Principal Contractor, during the construction phase of any project) and reviewed, as necessary, with any remedial works and / or recommendations for improvement considered and acted upon, where necessary;
- ▣ all persons having fire-safety-specific delegated tasks and / or functions are effectively performance monitored. Where these differ (see below) from those specified in the primary SHEF Policy document, the relevant functions represent the performance standards required, in the management of fire safety.

The Person(s) responsible for SHEF management will ensure that:

- ▣ the maintenance of the structure or fabric of our properties, so that fire separation and means of escape or egress are not compromised;
- ▣ all fire safety systems (e.g. fire detection and warning, emergency lighting, smoke control, fire suppression etc.) and equipment (e.g. fire extinguishers etc.) are maintained, inspected and tested by the appointed 'competent' engineer(s), in accordance with the service level agreement(s), tenancy agreement(s) and / or statutory obligation(s);
- ▣ **Fire Safety Plans** (see appendix), (i.e. as-built drawings) are provided for each property, indicating fire zones, protected shafts and structures, normal and alternative (i.e. fire exit) routes, refuges for disabled persons, locations of detection and / or warning devices and extinguishing equipment, utilities, specific hazards, procedural instructions and that the drawings other documents are kept up to date;
- ▣ All Supervisors and / or Managers are trained in and understand their individual responsibility for, implementing the Fire Safety Plan and evacuation procedure;
- ▣ weekly checks of all fire protection arrangements are undertaken, by Supervisors and / or Managers and that any / all deficiencies are recorded and that any remedial actions identified are followed up, to ensure a satisfactory conclusion;
- ▣ inspection and test records and defect reports are kept, for all fire safety systems and equipment
- ▣ any proposed alteration(s) to our property, likely to 'materially' affect the means of escape or other fire safety provisions are notified to the 'competent' SHEF advisor and that the existing FRA is reviewed, to take account of the proposed alteration and risk profile for the structure;
- ▣ Contractors are informed, before starting work, of fire evacuation procedures and fire safety provision;
- ▣ a written 'permit to work' is issued before proceeding with any operations involving hot work (e.g. welding, flame cutting, use of blow lamps or portable grinding wheels in areas near flammable materials etc.);
- ▣ procedures are in place for the safe removal of rubbish and waste from our premises and its safe storage, away from any building and ignition sources, whilst awaiting collection



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**All Supervisors and Managers in control of premises** will ensure that:

- ❖ **The Fire Safety Plan (see appendix)**, applicable to the premises under their control, activities or processes is available and current, it identifies all *'significant'* fire hazards and incorporates the associated precautions, to avoid where reasonably practicable the risk of fire;
- ❖ any new staff are provided with the fire safety information and instructions relevant to the premises (e.g. fire prevention measures, fire protection arrangements, evacuation procedures and exit routes etc.);
- ❖ fire prevention controls (i.e. separation of sources of fuel from sources of ignition) are implemented and fire protection arrangements are available, properly used and maintained;
- ❖ tenants areas are not used for purposes other than those for which they are designated, if to do so would increase the fire risk (e.g. unsuitable arrangement of furniture, excessive or insecure storage of combustible or flammable materials etc.);
- ❖ cleaning staff or Contractors do not store or leave any rubbish or other waste in corridors, stairways, lobbies or in the vicinity of fire exits;
- ❖ any storage of combustible or flammable materials and other hazardous substances are kept to a minimum and kept securely
- ❖ all corridors, stairways, lobbies and exits are checked, continuously, to keep them unobstructed at all times;
- ❖ weekly checks, of all fire protection arrangements are undertaken and any / all deficiencies are recorded and followed up for action;
- ❖ Contractors are working in accordance with the Fire Safety Plan for the premises and / or service level agreement and where necessary, in accordance with a *'permit to work'*;
- ❖ visitors are informed of any particular fire hazards and the fire evacuation procedures;

**All staff**, including those with specific-fire-related functions, above, will be expected to:

- ❖ make themselves aware of the Fire Safety Plan(s) for the building(s) / premises in which they work, or visit and cooperate with the Supervisor(s) and / or Managers in control, to ensure the effectiveness of the fire evacuation procedures;
- ❖ make themselves aware of the location of fire alarm activation call points, portable fire-fighting equipment (e.g. extinguishers, fire blankets etc.) escape routes and final exits;
- ❖ bring to the attention of the Supervisor(s) and / or Managers in control, or in their absence the Person(s) responsible for SHEF management, any defects or deficiencies in fire safety arrangements;
- ❖ assist with the evacuation of tenants and any visitors and / or Contractors, where and as appropriate, in the event of a fire but not to attempt to extinguish a fire, unless they have been trained to do so, actually feel both *'competent'* and confident and most importantly, without taking unnecessary personal risk

**Operational control**

Each Person responsible for SHEF management, acting as a Fire Safety Co-ordinator, is responsible, on behalf of the Director responsible for SHEF compliance, acting as the *'Responsible Person'*, for developing and documenting *'appropriate'* operational controls for the *'significant'* hazards and risks identified, within our property portfolio.

**Technical specifications**

- ❖ Passive measures (e.g. means of escape arrangements and exit route signage; fire resistance and separation requirements etc.) and active systems (e.g. fire detection and warning; emergency lighting; smoke control etc.) will be identified at each premises owned and / or occupied by us, following a *'site-specific'* FRA, undertaken by our *'competent'* SHEF Advisors, which will incorporate the use, construction and layout, inherent fire risks, the number and location of occupants and their mobility;
- ❖ All premises will be provided with a fixed fire detection and warning system, designed with appropriate performance outcome(s) in mind (i.e. cause and effect) and installed to the appropriate standard, particularly where *'delayed evacuation'* and *'progressive horizontal evacuation'* procedures exist or are planned;
- ❖ An enhanced system of automatic fire detection (AFD) will be provided for both life safety (e.g. excessive travel distances, residential and sleeping areas etc.) and asset protection, in areas containing precious artefacts (e.g. archive materials etc.) or high risk (e.g. computer servers and UPS installations; telecommunications; undivided roof spaces etc.);
- ❖ All premises will be fitted with emergency escape lighting, where required to enable occupants to locate, move safely along and escape from, a fire exit, to a place of ultimate (i.e. clear of the building), or relative

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(i.e. in a fire separated zone) safety. All emergency escape lighting systems will be inspected routinely (i.e. weekly) and serviced by a 'competent' person, at least annually;

- ❖ Appropriate portable fire-fighting equipment (e.g. extinguishers, fire blankets etc.) will be provided, depending on the relevant fire risks; fire extinguishers will be inspected and serviced at least annually, by a competent person, with any found to be unserviceable being replaced immediately. Any discharged or partly discharged extinguishers must be returned to the service provider for replacement, after use;
- ❖ The consequences of unintentional failure or partial failure of any life safety or asset protection system, leading to temporary loss of effectiveness, will be assessed, by the Person(s) responsible for SHEF management, in liaison with our SHEF Advisors and appropriate measures put in place, after discussion with the Director responsible for SHEF compliance.

### Storage of combustible and high-risk materials

- ❖ Storerooms and storage areas will, where reasonably practical, be segregated from other parts of the premises by an appropriate combination of distance and non-combustible, fire-resisting, structures, in accordance with the findings and recommendations contained within the fire risk assessment for the premises.
- ❖ All store rooms or areas used for storage of, or processes involving, high-risk flammable substances (e.g. petroleum spirit etc.) or explosive gases (e.g. oxygen etc.) will be provided with sufficient natural and / or mechanical ventilation, to prevent the formation of flammable or explosive atmospheres and will be subjected to an additional assessment, in accordance with the **Dangerous Substances and Explosive Atmospheres Regulations (DSEAR)**.
- ❖ A fire safety plan will be developed and maintained for each premises that we own and / or occupy and will contain the following information:
  - ❖ the results of the FRA, identifying the use of the premises, occupancy, building and inherent fire risks;
  - ❖ the fire evacuation procedure (see below), including up-to-date details of each and every **Personal Emergency Evacuation Plan (PEEP)** – see appendix, together with the list of 'competent' persons with specific responsibilities for fire safety (e.g. incident controller, fire marshals / wardens etc.);
  - ❖ scale (single-line) drawings of the building identifying:
  - ❖ the access points, places of ultimate safety (i.e. assembly areas) and relative safety (i.e. 'refuges' etc.);
  - ❖ fire zones and compartments, levels of fire-resistance, protected escape routes, fire fighting shafts and lifts, fire doors;
  - ❖ location of detection devices and alarm call points;
  - ❖ areas or rooms of particular fire or other hazard (e.g. commercial kitchens, sleeping accommodation etc.);
  - ❖ fixed and portable fire-fighting equipment
  - ❖ location and type of fire safety signs
  - ❖ any other relevant information (e.g. location of utilities, shut off valves, special equipment etc.)
  - ❖ schedules for the routine weekly, monthly or other checks, tests or inspections, to be carried out on any installed fire safety system and of the means of escape, such as the **Fire Safety Monitoring Form (see appendix)**, together with records of the results of such checks and all / any actions taken to remedy defects, during the previous 12 month period (i.e. a record file for all active and passive maintenance), with earlier records being systematically archived, for easy recovery;
  - ❖ record(s) of any fire safety inspection(s) or audit(s), action plan(s) and programme(s) of work(s) to undertake improvements or remedy defects and deficiencies;
  - ❖ The Supervisor(s) and / or Manager(s) in control of the premises will be responsible for implementing the fire safety plan, which must be retained in the premises to which it refers, at all times, together with the FRA, in order that it can be made available for inspection and / or use by the Fire & Rescue Service.



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## Fire evacuation procedure

- ❖ A detailed procedure will be developed for each premises that we own and / or occupy, covering the following:
  - ❖ Action on discovery of fire
  - ❖ Warning and evacuation signals and action(s) to be taken on hearing the alarm and / or receiving an alert (i.e. during the pre-alarm phase)
  - ❖ Calling of the Fire and Rescue Service
  - ❖ Evacuation, including 'delayed' evacuation, for persons able to evacuate themselves from 'suitably' constructed and / or maintained buildings and partial 'progressive' evacuation, of non-ambulant persons and others with mobility and / or sensory difficulties
  - ❖ Places of relative (i.e. refuges etc.) and ultimate (e.g. assembly areas) safety
  - ❖ Control of the building, including re-admission, if appropriate
  - ❖ Fire-fighting
  - ❖ The Supervisor(s) and / or Manager(s) in control of the premises, or a nominated deputy, acting as the '**Incident Controller**', will supervise the evacuation process, wherever tenants, visitors and / or Contractors are unable to evacuate themselves (i.e. this may not be possible in premises which are capable of relying totally on delayed evacuation principles) with the help and assistance of any other available staff.
  - ❖ Fire action notices will be provided throughout the premises, adjacent to each manual call point, providing information on the evacuation procedure relevant to that building, in addition to the same information being included with any tenancy agreement, provided upon occupation and routinely thereafter, when any revisions are made.
  - ❖ The Supervisor(s) and / or Manager(s) in control of the premises will be responsible for recording the weekly fire alarm test and any defects or failures, ensuring that all / any remedial action required is followed through to completion.
  - ❖ The fire evacuation procedure will normally be rehearsed, based on the nature of the occupancy and routine training sessions will be held for all staff, tenants and Contractors, on a regular (i.e. annual) basis, in order that they are made aware of the evacuation signal, escape routes, places of relative safety and assembly areas.

## Disabled persons

- ❖ The buildings and premises owned and / or occupied by us have, wherever possible, been designed, constructed and maintained to facilitate access for persons who have mobility or sensory (i.e. hearing, vision) impairments, with the intention of precluding any form of discrimination.
- ❖ Accordingly, the FRA for each of our premises will explicitly consider the means of escape, means of giving warning and other fire safety provisions in relation to the needs of all '*relevant persons*' (e.g. staff, tenants, visitors and Contractors etc.) and any anticipated impairment(s).
- ❖ In addition, each and member of staff, together with other '*relevant persons*', if applicable, will be evaluated with regard to their individual special needs and be provided with a [Personal Emergency Evacuation Plan \(see appendix\)](#) (PEEP), after seeking that individual's personal view(s).

The PEEP will take account of the ability to:

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- 📌 identify and understand the fire evacuation signal
- 📌 leave the flat or room of origin, safely and without assistance
- 📌 remain in a place of relative safety (e.g. the flat itself, if the building is designed, constructed and / or maintained to accommodate 'delayed' or 'progressive horizontal' evacuation and / or a 'refuge' constructed for the purpose)
  - 📌 All PEEP documents will be collated for strategic evaluation of evacuation procedures and resource requirements.
  - 📌 Members of staff and / or Contractors, who need to be aware of the specific evacuation requirements of the impaired person, will be provided with:
    - 📌 the contents of each PEEP
    - 📌 operating details for all / any special equipment (e.g. visual or vibration alarms, medical appliances, evacuation chairs etc.), provided to meet the requirements of an individual PEEP or any collective arrangements (e.g. 'refuge' communications, evacuation lifts, ramps etc.)
      - 📌 suitable and sufficient training to facilitate the safe evacuation of the impaired person under their care
      - 📌 Completed copies of all PEEP documents will be kept with the Fire Safety Plan and maintained with up-to-date information.

### Awareness, training and competence

We have a procedure to ensure that all members of staff are '*competent*' to undertake their role, for each relevant function and at each supervisory and managerial level. This is to ensure that they are aware of the policies and procedures, significant business aspects, impacts & risks, their roles and responsibilities in achieving conformance with policy and procedures and with the requirements of the SHEF Policy.

The Person(s) responsible for SHEF management will identify, plan and monitor the training needs for staff whose work activities have the potential to create a significant impact upon our operations and maintain appropriate staff training records, ensuring they are monitored and reviewed on a regular basis.

All staff will be provided with the information and training commensurate with their position, although the following will be the minimum input, for all members of staff:

- 📌 this fire safety policy and associated procedures, with particular regard to their individual responsibilities
- 📌 combustion theory and consequences of uncontrolled fire situations
- 📌 fire prevention methods and the importance of good housekeeping in preventing the outbreak of fire
- 📌 fire protection arrangements and the importance of keeping all fire doors closed, to limit the spread of fire, heat and smoke
- 📌 what action to take if they discover a fire
- 📌 how to raise the alarm and the location of the fire alarm call points
- 📌 what action to take immediately on hearing the alert (i.e. during the pre-alarm phase) and evacuation signals
- 📌 the procedure for contacting the Fire and Rescue Service and responding on their arrival, including how to safely isolate or shutdown process plant or equipment, where appropriate
- 📌 the location of escape routes, including those routes not used regularly for normal access and egress and their responsibility to direct or escort tenants, visitors and members of the public to escape routes (and in the case of disabled persons, to the nearest useable escape route or refuge)
- 📌 the location and safe use of portable or other fire extinguishing equipment

New starters will be given basic fire safety information and training, covering the above elements, during their first week of employment, by the Supervisor(s) and / or Manager(s) in control of the premises or the Person(s) responsible for SHEF management, if the new starter is a Supervisor(s) and / or Manager(s) in control of the premises, or fulfils a higher-level position.

Supervisor(s) and / or Manager(s) in control of the premises, maintenance and other staff, who have specific responsibilities, under this fire safety policy, will be given additional instruction and training appropriate to their role.

The Person(s) responsible for SHEF management will ensure that members of staff, tenants, visitors and Contractors are provided with the appropriate fire safety information and instructions and information relating to the premises they occupy or the building where they work, respectively, as well as any work process or activity that creates a risk of fire.

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## LONE WORKING AND PERSONAL SAFETY

### Policy statement

Working alone is not in itself against the law and it will often be safe to do so but we will consider carefully and then deal with any health and safety risks for any members of staff and / or Contractors working alone.

### Definitions

- ☒ **Lone worker** – Anyone who works by themselves without close or direct supervision, for example:
- ☒ Staff travelling to other premises or sites, for meetings etc.
- ☒ Any worker arrive early or staying late, in the workplace or some a remote location, on their own
- ☒ Any Contractor working out of hours or in remote locations
- ☒ Contractors on call out for emergencies

### Primary statutory provisions (latest versions)

- ☒ **Management of Health and Safety at Work Regulations**
- ☒ **Workplace (Health, Safety and Welfare) Regulations**
- ☒ **Health and Safety (First Aid) Regulations**
- ☒ **Occupiers Liability Act**

### Assessment (generic) and provision of lone working procedures

Many of the hazards that lone workers face are similar to those faced by other workers, although the risks involved may be greater because the worker is on their own. Increased or additional risk(s) could, therefore, arise from:

- ☒ Fire
- ☒ Inadequate provision of rest, hygiene, and welfare facilities
- ☒ Violence and abuse from members of the public
- ☒ Theft and intruders
- ☒ Sudden illness and other emergencies
- ☒ Effects of social isolation
- ☒ Risks related to driving
- ☒ Lack of supervision and / or training

Although some of the activities undertaken by lone workers are covered by the relevant 'generic' risk assessment(s), it is not just the actual work but also the working environment that needs to be considered. Accordingly, a '**dynamic**' risk assessment (DRA) process allows the worker(s) to make operational decisions, based on risks that cannot necessarily be foreseen.

A DRA is not a substitute for a comprehensive risk assessment but in some cases it is not always possible to identify all hazards relating to a role where the working environment is outside of our control but understand that it is not an excuse to transfer responsibility to the worker, particular where the risk(s) can be pre-empted (e.g. violence, working remotely and / or at home etc.).

Some simple guidelines, to be agreed, between the worker and the relevant Person responsible for SHEF management and implemented on a case-by-case basis are indicated below.

### Working alone in the usual workplace

Where possible, agree with the Supervisor(s) and / or Manager(s) in control of the premises, a procedure to tackle problems associated with lone working, which may include some or all of the following:

- ☒ reporting lines, especially if working out-of-hours
- ☒ a signing-in and out procedure
- ☒ access and egress arrangements
- ☒ welfare facilities
- ☒ incident reporting, first-aid arrangements and emergency procedures
- ☒ specific risk assessment(s) and protective and preventive measures
- ☒ arrangements for the provision of work equipment

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## Working remotely and / or away from the usual workplace

If the work involves a visit to another workplace, the protective and preventive measures would generally be the responsibility of the person in control (host) of that workplace, although we understand that we may need to co-operate and co-ordinate our activities. We are aware of the following additional potential problems, for workers in this situation, which may need to be agreed prior to work activity commencing:

- 📦 transport
- 📦 supervision
- 📦 communication
- 📦 accident procedures
- 📦 incident reporting
- 📦 work equipment

## Monitoring

We will adopt relevant procedures to monitor any lone worker(s), based primarily on effective communication, including:

- 📦 supervisory visits and observation, if and when possible;
- 📦 pre-agreed intervals of regular contact, between us and the lone worker, using voice communication (preferably) as well as text messaging and / or email, although we appreciate that only direct voice contact guarantees receipt of any message;
- 📦 implementation of robust system to ensure that the lone worker has returned to their base, or home, once their task is completed;
- 📦 if necessary, we will also provide a suitable, manually-operated, warning device, or in exceptional circumstances, one that automatically triggers if specific signals are not received periodically from the lone worker

## Security

Although overall responsibility for security rests with the Director responsible for SHEF compliance, all members of staff are expected to take adequate care of their own property, without putting themselves at risk. They should report any security incidents, near misses or suspicious circumstances to the Supervisor(s) and / or Manager(s) in control of the premises and follow this up, using the [Incident Report Form \(see appendix\)](#).

We will ensure that resources are made available to ensure that 'significant' security risks are adequately controlled and policies and procedures are implemented, for maintaining security and that these are regularly reviewed. The basic principles of security incorporates the following process:

- 📦 Deter criminal activity, where possible, through the assessment of threats to staff, others and property
- 📦 Deny the criminal the opportunities and delay the attack if it happens
- 📦 Detect the crime when it is committed
- 📦 Respond effectively to incidents, including near miss and suspicious circumstances
- 📦 Ensure it cannot happen again by thorough investigation and appropriate follow up action

Some specific areas for action can also be identified, in 'generic' terms, as follows:

- 📦 **Crime Prevention** - The cornerstone of any security policy and to be successful all members of staff are expected to be involved and of particular importance is protection from assault and to prevent their property from being stolen.
- 📦 **Property security - Particular attention is paid to the protecting of our premises and the equipment they contain.** A regular review of access control arrangements and procedures will be undertaken, by the Supervisor(s) and / or Manager(s) in control of the premises, to ensure its integrity, which will include control of visitors, booking-in arrangements and fire safety requirements.
- 📦 **Fraud** - We will ensure that:
  - 📦 No member of staff is ever in a position to be able to receive goods and authorise payment without management oversight
  - 📦 There are as many independent checks as possible within the system of ordering, receiving and paying for goods.
  - 📦 The Finance Manager must be informed immediately where fraud is suspected
  - 📦 Where security issues arise, there is to be close liaison between those directly involved in security with internal audit and personnel.

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- ❖ **Computers** - The security of our computer systems, including the software, is the responsibility of the Finance Manager who should ensure:
- ❖ Confidentiality – access to the system is confined to those with specified authority
- ❖ Integrity – the system is operating according to the specification.
- ❖ Availability – data output is delivered to the point where it is required when it is needed

**Note:** *The need for security must be balanced with the need to avoid slowing down computer operations, taking into account the sensitivity of the information and its value to us, while complying with the requirements of the Data Protection Act and Computer Misuse Act.*

#### **Information and communications security**

In relation to document control, our policies and procedures will ensure that:

- ❖ Sensitive material is classified correctly
- ❖ Classified papers are kept to a minimum
- ❖ Such papers are easily traceable
- ❖ A check would reveal losses
- ❖ Staff know the rules
- ❖ The rules are diligently applied

In relation to the release of information, our policies and procedures will cover:

- ❖ Release of information about patients, clients or residents
- ❖ Release of information to the police, news media and other enquiries
- ❖ Access to communications equipment is to be controlled, including:
- ❖ Facsimile transmissions and telex machines
- ❖ Telephone switchboards

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## MANUAL HANDLING OPERATIONS

### Policy statement

We will ensure that operations that involve 'significant' manual handling risk(s) are eliminated, so far as is reasonably practicable.

Where this is not possible, we will adopt measures to reduce the risk(s), such as ergonomic design of the workplace, equipment and activities and the provision of automated or mechanical aids, where necessary.

### Definitions

- Manual handling** – Any transporting of a load, including lifting, putting down, pushing, pulling or carrying or moving, by hand or bodily force

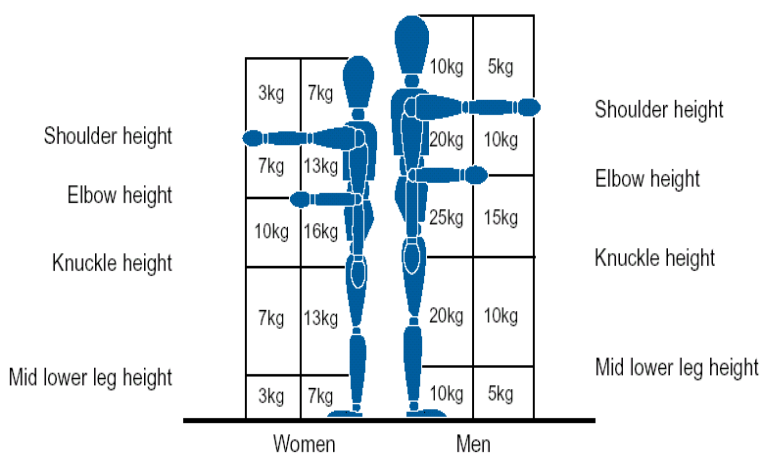
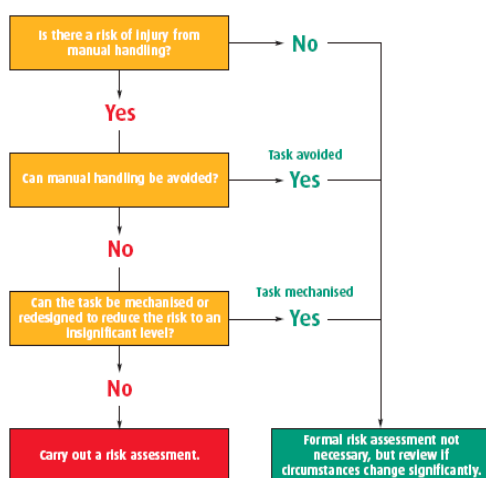
### Primary statutory provisions (latest versions)

- Management of Health and Safety at Work Regulations
- Manual Handling Operations Regulations

### Assessment (generic) and provision of manual handling operations management

We understand that manual handling operations cause over a third of all workplace injuries, which include work-related musculoskeletal disorders (MSDs), such as pain and injuries to arms, legs and joints and repetitive strain injuries of various sorts. They can occur almost anywhere in the workplace and awkward postures, repetitive movements of arms, legs and back or previous / existing injury can increase the risk.

Accordingly, as these injuries can have serious implications for us, as well as the person who has been injured, we aim to prevent them altogether, by avoiding such tasks, 'so far as is reasonably practicable'. However, where it is not possible to avoid handling a load, we will consider the risk(s) of those task(s) and implement sensible measures, to prevent and avoid injury, based on the flow chart below (left). In most cases, however, manual handling operations can be safely undertaken, based on the 'safe lifting guidelines' shown in the chart below (right).



Where this is not possible, a formal person / activity risk assessment will be undertaken, by one of the Persons responsible for SHEF management, to reduce to the risk of injury to 'as low as reasonably practicable'.



## Formal risk assessment

A full **Manual Handling Risk Assessment (see appendix)** will be conducted, by one of the Persons responsible for SHEF management, whenever 'significant' manual handling operations are undertaken (i.e. in excess of the 'safe lifting guidelines', indicated above) that cannot be reduced sufficiently, in the initial assessment. The following factors will need to be considered during the assessment:

### **The Task**

- ▣ Bending and stooping to lift a load significantly increases the risk of back injury
- ▣ Items should ideally be lifted from no lower than knee height to no higher than shoulder height. Outside this range, lifting capacity is reduced and the risk of injury is increased.
- ▣ Where items are required to be lifted from above shoulder height, a stand or suitable means of access should be used.
- ▣ Items that are pushed or pulled should be as near to waist level as possible and pushing is preferable, particularly where the back can rest against a fixed object to give leverage.
- ▣ Carrying distances and repetitive tasks should be minimised.
- ▣ Tasks that involve lifting and carrying should be designed in such a way as to allow for adequate rest breaks.
- ▣ Avoid tasks that require twisting the body wherever possible.

### **The Individual**

- ▣ Consideration must be given to age, body weight and physical fitness.
- ▣ Regard must be given to personal limitation; members of staff must not attempt to handle loads that are beyond their individual capability.
- ▣ Assistance must be sought where this is necessary.
- ▣ Persons with genuine physical or clinical reasons for avoiding lifting should be made allowance for, as should pregnant women, who should not be required to undertake hazardous lifting or carrying tasks.
- ▣ Sufficient knowledge and understanding of the work is an important factor in reducing the risk of injury and individuals undertaking lifting or carrying will be given suitable instruction, training and information to undertake the task, with minimum risk.

### **The Load**

- ▣ The load should be kept as near as possible to the body trunk to reduce strain and should not be of such size as to obscure vision.
- ▣ An indication of the weight of the load and the centre of gravity should be provided where appropriate.
- ▣ Unstable loads should be handled with particular caution. The change in centre of gravity is likely to result in overbalancing.
- ▣ Ensure that there is a secure handhold, using gloves where necessary to protect against sharp edges or splinters.

### **The Environment**

- ▣ There must be adequate space to enable the activity to be conducted in safety and the transportation route must be free from obstruction.
- ▣ Lighting, heating and weather conditions must be taken into account.
- ▣ Floors and other working surfaces must be in a safe condition, and adequate ventilation is required, particularly where there is no natural ventilation.

### **Other Factors**

- ▣ Use of personal protective equipment (PPE) may be necessary, whilst carrying out manual handling activities, although this should not restrict safe and easy movement.

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### Staff responsibilities

We expect all members of staff and any Contractors to use their head (figuratively, not literally), before undertaking any manual handling operations, by considering the factors above, for which an easy to remember mnemonic is **T.I.L.E. (The Individual, Load, Environment)**

They are also required to follow safe systems of work, ensuring that they:

- ▣ Do NOT move anything they do not feel able to handle, safely
- ▣ comply with instruction and training which is provided in safe manual handling activities
- ▣ use any equipment which has been provided to minimise risks associated with safe manual handling activities
- ▣ report any work activity or condition, which may be detrimentally affected by a manual handling activity, to the Supervisor(s) and / or Manager(s) in control of the premises
- ▣ report any personal issues (i.e. ill-health, use of drugs etc.), which may detrimentally affect their personal ability to undertake manual handling activity, to the Person(s) responsible for SHEF management

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## OCCUPATIONAL HEALTH AND WELLBEING, INCLUDING STRESS

### Policy statement

We understand that the vast majority of occupational ill health issues result from a small number of basic causes, all of which can be controlled by working together with our staff, to identify practical control measures that are suitable for their workplace.

We also believe that occupational health embraces the effect of work activities on health and conversely, the effect of ill health on work. This can include, amongst other things, sudden (acute) injury or long-term (chronic) occupational disease or conditions.

We are committed to the health and wellbeing of our staff, although we believe this to be a shared responsibility, as our members of staff are required to look after their own health and safety. Accordingly, we have not established a specialist occupational health contract but we will pay for medical advisors to control occupational health, on a case-by-case basis, as and where appropriate.

Good practice dictates that, other than when assisting the worker to develop (I.I.T.S), we will endeavor to fit the task to the worker, rather than fit the worker to the task, alone, by introducing appropriate health surveillance, rehabilitation and recovery programmes, where appropriate. We also plan to help the disabled to secure and retain work and help members of staff to make informed choices regarding lifestyle issues.

### Definitions

- 📖 **Fatigue** – The (normally temporary) inability, or strong disinclination, to respond to a stimulus, due to previous physical, mental or emotional over-activity.
- 📖 **MSD** – Musculoskeletal disorder, comprising mainly work-related upper limb disorder (WRULD) and back injuries
- 📖 **Stress** – An adverse reaction to pressure or demand
- 📖 **Stressors** – Causes of stress and although we understand that stressors occur in many situations, we are concerned here with the interaction between a person and their work environment
- 📖 **Well-being** – A state of contentment, in the work environment, which allows individuals to flourish and achieve their full potential, for the benefit of themselves and the < Company / Organisation >

### Primary statutory provisions (latest versions)

- 📖 **Management of Health and Safety at Work Regulations**
- 📖 **Equality, Data Protection and Access to Medical Records Acts**
- 📖 **Control of Substances Hazardous to Health Regulations**
- 📖 **Health and Safety (Display Screen Equipment) Regulations**
- 📖 **Manual Handling Operations Regulations**
- 📖 **Noise at Work Regulations**

**Note:** *This list is not exhaustive*

### Assessment (generic) and provision of occupational health management

The risk of a worker suffering occupational ill health at work is generally considered to be more than twice that of sustaining an injury, which is reflected in the fact that more civil claims now result from occupational ill health issues than from safety issues - reversing the trend in earlier years.

Occupational health is also more difficult to manage than safety, as the causes and consequences of poor safety, at work, are immediate and often relatively easy to deal with, whereas work-related causes of ill health can be more difficult to spot. It often takes some time for symptoms to develop, so the connection between cause and effect is less obvious but once the problems have been recognised and acknowledged, solutions are now well documented.

The need for health surveillance will be determined in response to the findings of either an incident report or a risk assessment(s), in particular where there is a statutory need to identify health surveillance, such as when staff come into contact with hazardous substances, noise or when a 'frequent' user of display screen equipment.

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## Medical screening

Certain occupational activities present a degree of risk to the individuals involved in them. This can be due to the effects of substances, processes or materials on the health of those working with them.

- ❖ **Pre-employment** - All offers of appointment made to external candidates are subject to potential medical clearance by an occupational health specialist. All people who accept an offer of employment must complete the 'confidential' [Employment Medical Questionnaire \(see appendix\)](#) and forward it to the Director responsible for SHEF compliance. If further information is required our appointed Medical Advisor may contact the individual and a final contract of employment will not be issued until medical clearance has been provided.
- ❖ **Contamination from hazardous substances** - Anyone unavoidably working with substances known to be hazardous to health (e.g. an identified carcinogen) must undergo medical surveillance to ensure that the measures being taken to control the working environment and protect them from the effects of the substances are effective.
- ❖ **Disability** - A risk assessment will be carried out, in order to ascertain any potential hazards that may subsequently be reduced, as far as is reasonably practicable.

## Environmental issues

Any member of staff with concerns about their working environment should make their concerns known to Supervisor(s) and / or Manager(s) in control of the premises, so the appropriate action can be taken.

Staff will be informed of any known risks that are associated with their work; any signs and symptoms of work related ill health and how to report them, before they commence work.

Stress, however, is often identified first, by work colleagues and family members and it is important that we can all identify some of the signs and symptoms in others, including managers. For instance, some of the more common indicators include and / or may incorporate a combination of the following:

- ❖ Behavioural changes and / or mood swings
- ❖ Constant tiredness
- ❖ Anxiety and / or low-self-esteem
- ❖ Persistent lateness and / or inability to manage time
- ❖ Poor memory and / or concentration
- ❖ Changes in eating and / or sleeping patterns

The [Stress Assessment Tool \(see appendix\)](#) can be used to 'identify stressors' (part 1), 'score the assessment' (part 2) and in the case of individuals, 'reach agreement' (part 3) about how they can be eliminated or at least best controlled. The tool can also be used to identify team stressors, from which to control general workplace issues, such as training needs, task design or flexible working arrangements etc., as well as to compare stress levels between groups of workers and / or team tasks.

## Ill health reporting

Members of staff are required to notify the Supervisor(s) and / or Manager(s) in control of the premises of any ill health symptoms they experience, which they consider to be related to their work. In the case of stress, however, the individual may wish to speak with a work colleague or friend, who may be better able to assist in determining the 'root' cause, although the Supervisor(s) and / or Manager(s) in control of the premises should, where possible, be made aware of any / all 'significant' issues, in order that the 'facts' (i.e. nature of the stress, background, duration, family / financial constraints etc.) can be investigated and consideration given to seeking / providing professional medical help.

Any work-related ill health, or clusters of illness or medical conditions, must then be reported, by the Supervisor(s) and / or Manager(s) in control of the premises, to one of the Persons responsible for SHEF management.

Where any member of staff has been on sickness absence for 4 or more weeks, or due to return to work after surgery or a medical condition, which may be exacerbated or influenced by their work, the relevant Person responsible for SHEF management should consider a medical referral, prior to recommencing work activity.

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### Rehabilitation / post sickness assessment

The Occupational Health provider will assess any staff returning to work following long-term sickness (i.e. 4 weeks, or more) with regard to necessary rehabilitation and provide a report to the appropriate Persons responsible for SHEF management, to ensure that the work activity has been properly assessed and controlled, including the need for statutory health surveillance and notified to Director responsible for SHEF compliance.

A further person-specific risk assessment will need to be undertaken, prior to the member of staff returning to normal work activity.

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## PERSONAL PROTECTIVE EQUIPMENT (PPE)

### Policy statement

We will, so far as is reasonably practicable, provide the facilities, procedures and resources to protect our staff and contractors from risks to their health and safety, that cannot be controlled at source.

We will, therefore, give effect to our duties under both the Management and PPE Regulations, by providing general protection (i.e. safety footwear and gloves, hard hat, eye protection and hi-visibility clothing) where general risks are involved and will access and provide specific protection (e.g. safety harnesses and respiratory equipment etc.), separately, in accordance with the specific legislation that applies, with the advice and assistance of our SHEF Advisors, where necessary.

### Definitions

- ☒ **PPE** – All equipment (including clothing affording protection against the weather) which is intended to be worn, or held, by a person at work and which protects them against one or more risks to their health and / or safety, and any addition or accessory designed to meet that objective.

**Note:** Ordinary working clothes and uniforms, which do not specifically protect the health and safety of the wearer is NOT classed as being PPE.

### Primary statutory provisions (latest versions)

- ☒ Management of Health and Safety at Work Regulations
- ☒ Personal Protective Equipment at Work Regulations
- ☒ Construction (Design and Management) Regulations
- ☒ Control of Substances Hazardous to Health Regulations
- ☒ Control of Asbestos Regulations
- ☒ Noise at Work Regulations
- ☒ Manual Handling Operations Regulations
- ☒ Working at Height Regulations

*Note: This list is not exhaustive, as virtually all SHEF legislation refers to the provision and use of PPE, although the requirements of the more specific legislation will take precedence, where the general requirements are not comprehensive enough.*

### Assessment (generic) and provision of PPE management

We have arranged to make our properties and activities safe, so far as is reasonably practicable, including the provision of safe systems of work that incorporate routine and specific procedures (e.g. permitting etc.) and appropriate information (hazards etc.), instructions (manufacturers etc.), training (commensurate with complexity) and supervision (I.I.T.S), to encourage people to work safely and responsibly.

However, even where engineering controls and safe systems of work have been applied, some hazards might remain, including:

- ☒ flying particles or splashes of corrosive liquids (e.g. the eyes)
- ☒ from falling materials or sharp objects (e.g. the head and feet)
- ☒ from breathing in contaminated air (e.g. the lungs)
- ☒ from contact with corrosive materials (e.g. the skin)
- ☒ from extremes of heat or cold (e.g. the body)

Accordingly, PPE should only be needed, as a 'last resort' (i.e. after the 'higher-level' controls have been implemented), to further reduce any 'residual' risk that cannot, otherwise, be fully controlled.

### Selection

We will only provide PPE that is:

- ☒ a 'last resort' measure, in accordance with the findings of a risk assessment
- ☒ compatible with the wearer's needs (e.g. size, fit and weight etc.), particularly if more than one item is being worn at a time.
- ☒ 'CE' marked

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The following PPE will be provided in relation to the hazards shown:

- 📦 **Eyes:**
  - 📦 Hazards include chemical or metal splash, dust, projectiles, gas and vapour, radiation
  - 📦 Options are safety spectacles, goggles, face screens, face shields, visors
- 📦 **Head and neck**
  - 📦 Hazards include impact from falling or flying objects, risk of head bumping, hair getting tangled in machinery, chemical drips or splash, climate or temperature
  - 📦 Options are industrial safety helmets, bump caps, hairnets etc.
- 📦 **Ears**
  - 📦 Hazards (noise) include a combination of sound level and duration of exposure, very high-level sounds are a hazard even with short duration
  - 📦 Options are earmuffs, earplugs, semi-insert / canal caps
- 📦 **Hands and arms**
  - 📦 Hazards include abrasion, temperature extremes, cuts and punctures, impact, chemicals, electric shock, radiation, vibration, biological agents and prolonged immersion in water
  - 📦 Options are gloves, gloves with a cuff, gauntlets and sleeves that cover part or all of the arm
- 📦 **Feet and legs**
  - 📦 Hazards include wet, hot and cold conditions, electrostatic build-up, slipping, cuts and punctures, falling objects, heavy loads, metal and chemical splash, vehicles
  - 📦 Options are safety boots and shoes, with protective toecaps and penetration-resistant, mid-sole wellington boots and specific footwear (e.g. chainsaw boots)
- 📦 **Lungs**
  - 📦 Hazards include oxygen-deficient atmospheres, dusts, gases and vapours
  - 📦 Options (respiratory protective equipment) are respirators (filters or powered) and breathing apparatus (e.g. fresh-air hose, compressed airline and self-contained)
- 📦 **Whole body**
  - 📦 Hazards include heat, chemical or metal splash, spray from pressure leaks or spray guns, contaminated dust, impact or penetration, excessive wear or entanglement of own clothing
  - 📦 Options are conventional or disposable overalls, boiler suits, aprons, chemical suits

**Emergency / rescue equipment**

We will seek expert advice and assistance when selecting equipment and training staff for high-risk operations (e.g. working in confined spaces, at height and over or near water etc.), emergencies and / or rescue (e.g. compressed-air escape breathing apparatus, respirators and safety ropes or harnesses).

**Use and maintenance**

All persons who have been issued with PPE (i.e. wearers) or emergency / rescue equipment are required to use it as trained and directed, or otherwise required (i.e. in accordance with the manufacturers' instructions, site rules and or risk assessment).

The Person(s) in Control of the Premises (or Site) and all wearers are required to ensure that all PPE provided is looked after (e.g. cleaned and in good condition) and properly stored (e.g. in a dry, clean cupboard or car boot) when not in use.

All lost, damaged and / or malfunctioning PPE must be reported, to the Person(s) in Control of the Premises (or Site), at the very earliest opportunity.

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## PROVISION AND USE OF WORK EQUIPMENT

### Policy statement

We will ensure that the work equipment we provide is suitable for use and for the purpose and conditions in which it is to be used; maintained in a safe condition for use so that people's health and safety is not at risk; and inspected, in certain circumstances, to ensure that it is and continues to be safe for use.

We will also ensure that a competent person carries out any inspection(s), with a record kept, until the next inspection (at least) to confirm that that risks created by using the equipment have been eliminated, where possible and / or controlled, as far as reasonably practicable, by taking appropriate:

- ❖ Hardware measures such as providing suitable guards, protection devices, markings and warning devices, system control devices, such as emergency stop buttons and personal protective equipment; and
- ❖ Software measures such as following safe systems of work (e.g. ensuring maintenance is only performed when equipment is shut down etc.), and providing adequate information, instruction and training about the specific equipment.

A combination of these measures will normally be necessary, depending on the requirements of the work, the assessment of the risks involved and their practicability.

### Definitions

- ❖ **Installation** – An assembly of components, which function as a whole in order to achieve a common end (e.g. gas and electrical installations, noise or machinery enclosures etc.).
- ❖ **Mobile Work Equipment** – Any work equipment that carries out work while travelling or travels between different locations where it is used to carry out work (e.g. fork-lift trucks, trailers, mobile cranes etc.) *Note: Equipment that is pedestrian controlled (e.g. wheelbarrows, lawnmowers etc.) is not classed as mobile work equipment.*
- ❖ **Safeguard** – Any work equipment where the risks could not be designed out (i.e. 'residual' risks) must be provided with safeguards, which include fixed guards (i.e. secured with screws, or nuts and bolts), interlocks, two-hand controls, light guards, pressure-sensitive mats etc.
- ❖ **Use** – Any activity involving work equipment, including starting, stopping, programming, setting, transporting, repairing, modifying, maintaining, servicing and cleaning.
- ❖ **Work equipment** – Any equipment or machine, appliance, apparatus, tool (including hand tools) or installation for 'use' at work (whether exclusively or not).  
*Note: Motor vehicles, which are not privately owned, are also classed as work equipment, although, when they are driven on public highways, road traffic legislation takes precedence.*

### Primary statutory provisions (latest versions)

- ❖ **Management of Health and Safety at Work Regulations**
- ❖ **Provision and Use of Work Equipment Regulations**
- ❖ **Workplace (Health, Safety and Welfare) Regulations**
- ❖ **Construction (Design and Management) Regulations**
- ❖ **Supply of Machinery (Safety) Regulations**

### Assessment (generic) and provision of work equipment management

Working with machinery can be dangerous because moving machinery can cause injuries in many ways:

- ❖ People can be hit and injured by moving parts of machinery or ejected material. Parts of the body can also be drawn into or trapped between rollers, belts and pulley drives.
- ❖ Sharp edges can cause cuts and severing injuries, sharp-pointed parts can stab or puncture the skin, and rough surface parts can cause friction or abrasion.
- ❖ People can be crushed both between parts moving together or towards a fixed part of the machine, wall or other object, and two parts moving past one another can cause shearing.
- ❖ Parts of the machine, materials and emissions (such as steam or water) can be hot or cold enough to cause burns or scalds and electricity can cause electrical shock and burns.
- ❖ Machinery can become unreliable and developing faults due to poor or no maintenance or when machines are used improperly through inexperience or lack of training.

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## Prior to use

All Persons in Control of a Premises or Site are required to ensure that:

- ▣ all work equipment is suitable for both its intended use (i.e. the right equipment for the job) and environment and 'CE' marked;
- ▣ the equipment is complete, free from defect and fitted with all necessary safeguards;
- ▣ safe systems of work have been developed and / or implemented;
- ▣ the equipment is subject to an appropriate inspection, testing (if appropriate) and maintenance regime, based on any statutory requirement, manufacturers recommendations and the relevant risk assessment(s), with suitable records being kept and maintained
- ▣ Ensure that all members of staff and contractors are aware of the following rules:
  - ▣ **Do .....**
    - ▣ check the machine is well maintained and fit to be used (i.e. appropriate for the job, working properly and all the safety measures are in place – guards, isolators, locking mechanisms, emergency off switches etc.)
    - ▣ use the machine properly and in accordance with the manufacturer's instructions;
    - ▣ wear the appropriate protective clothing and equipment, required for that equipment, (e.g. safety glasses, hearing protection and safety shoes);
  - ▣ **Don't .....**
    - ▣ Use any equipment unless authorised or without appropriate training (i.e. for some equipment a formal qualification is needed) ;
    - ▣ use equipment that has a danger sign or tag attached, which should only be removed by an authorised person who is satisfied that the machine or process is now safe;
    - ▣ remove any safeguards, even if their presence seems to make the job more difficult;
    - ▣ wear dangling chains, loose clothing, rings or have loose long hair that could get caught up in moving parts;
    - ▣ distract people who are using machines.

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## RISK MANAGEMENT, ASSESSMENT AND CONTROL

### Policy statement

Risk comes from a number of sources (e.g. financial, operational, people etc.) but essentially takes two forms, either negative, as threats or positive, as opportunities. In either case, effective risk management is concerned with the identification, assessment and prioritisation of the risk(s), followed by the appropriate application of resources to minimise, control and monitor any threats but to maximise any opportunities.

Strategies for minimising threats (i.e. uncertainties with negative consequences), in this instance relating to occupational issues, include avoiding the threat altogether (e.g. prohibiting and / or redesigning etc.), transferring it to someone else (e.g. insuring and / or outsourcing etc.), accepting some or all of the threat (e.g. tolerating and / or seeking potential reward etc.), or reducing the probability or negative consequences of the threat (e.g. adopting control measures etc.).

We have taken a simple approach to risk management, which uses the 'plan, do, check, act' principal. Leadership is the starting point and we will endeavour to plan and support our activities, from the front, believing that our people are our most important asset. Based on a culture of care, we will perform our core functions and processes in such a way as to safeguard our people and others who may be affected, while constantly evaluating our performance to continuously improve.

As part of this approach, we are required, by law (see below) to carry out 'suitable and sufficient' risk assessments of our 'significant' occupational risks and we will adopt good practice, wherever possible, by extending this statutory duty to include operational, financial and reputational risks.

We delegate this task to a number of 'competent' persons, both members of staff and Contractors, some of whom provide 'specialist competence', although we retain control of what assessments are being carried out, through constant review and monitoring and their implementation.

### Definitions

- 📖 **Assessment (of risk)** – An evaluation process that identifies hazards, evaluates the level of harm arising and permits a judgment to be made about its control
- 📖 **Competent** – A person with appropriate Knowledge, Experience, Personal attributes and Training (K.E.P.T) to undertake the task required (in this instance, risk assessment)
- 📖 **Hazard** – Anything with the potential to cause harm (e.g. injury, disease, damage or loss)
- 📖 **Risk** – The level of uncertainty about an (workplace) event and / or condition that might have either an adverse or beneficial effect on an objective (e.g. zero accidents etc.)
- 📖 **Risk rating (factor)** – The probability of something happening multiplied by the resulting cost or benefit, if it does (i.e. Likelihood X Severity = Risk)

### Primary statutory provisions (latest versions)

- 📖 **Management of Health and Safety at Work Regulations**
- 📖 **Regulatory Reform (Fire Safety) Order**
- 📖 **Health and Safety (First Aid) Regulations**
- 📖 **Health and Safety (Display Screen Equipment) Regulations**
- 📖 **Manual Handling Operations Regulations**
- 📖 **Noise at Work Regulations**
- 📖 **Working at Height Regulations**
- 📖 **Control of Asbestos Regulations**
- 📖 **Construction (Design and Management) Regulations**

**Note:** This list is not exhaustive, as virtually all SHEF legislation requires risk assessment.

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## Assessment (generic) and provision of risk management

We are used to evaluating and taking risk, in a business setting to obtain reward, so it should be a simple transition to understand that managing our SHEF risk is about sensible and practical steps to protect people (predominantly), property and the environment from harm, not bureaucratic back covering.

As part of managing our SHEF issues, we will control the '*significant*' risks by thinking about what might cause real and / or the most harm to any '*relevant person(s)*', property, the environment and / or our reputation (see risk register), in order that we can decide what '*reasonable*' steps we can take, to prevent that harm.

We have adopted a formalised but simple approach to the risk assessment process, which requires the identification and rating of risks found, for classification and prioritisation. The standard [Risk Assessment Form \(see appendix\)](#) is an effective way to identify sources of danger and prioritise methods to eliminate or reduce risk, to '*as low as reasonably practicable*' (ALARP), where a regulation specific (e.g. fire, COSHH, DSE, manual handling etc.) assessment is not required, although these are specifically dealt with in separate procedures.

### Risk assessment process

The process below allows us to identify '*significant*' risks and produce both '*generic*' (i.e. similar work activities and / or conditions) and '*specific*' (i.e. applicable to persons, premises, plant and equipment or procedures) risk assessment documents.

In some circumstances, however, rapidly changing and / or unforeseen events and / or conditions will affect the working environment and also need to be considered, sometimes to supplement and sometimes as an alternative, to the '*generic*' and / or '*specific*' risk assessments. In these instances, a '*dynamic*' risk assessment (DRA) process allows the individual worker(s) to make operational decisions, based on risks occurring in real time.

A DRA is not a substitute for a comprehensive risk assessment but in some cases it is not always possible to identify all hazards relating to a role, in advance, where the working environment is outside of our control. We understand that it is not an excuse to transfer responsibility to the worker, particular where the risk(s) can be pre-empted (e.g. violence, working remotely and / or at home etc.) but it does allow unforeseen circumstances to be dealt with, in a safe way, as one element of our 'behavioural' safety approach.

Whenever an unforeseen event or condition has been identified and DRA has been used, the information MUST be reported to the relevant Person responsible for SHEF management, as it can no longer be considered unforeseeable and needs to be incorporated into the comprehensive risk assessment documentation, for the benefit of other members of staff. Where appropriate, this can be done using the [Incident Report Form \(see appendix\)](#) and reported as a '*near-miss*', on the basis that it highlights a potential failing in the safe system of work.

Where necessary, we will provide the relevant members of staff with training to improve their knowledge of the risk assessment procedure although, regardless of the type of risk assessment being undertaken, the following six-step process will assist our staff, when undertaking the assessment(s):

- 📌 Identify and report hazards arising in relation to people, places and plant and equipment, to the Supervisor or Manager in control of the premises
- 📌 Examine existing controls and ensure they adequately control the hazard(s)
- 📌 Evaluate those risks (i.e. Likelihood x Severity) that are not adequately controlled or cannot be eliminated
- 📌 Introduce extra / new control measures or training to control risks
- 📌 Record '*significant*' findings
- 📌 Set a review date

### Principles of prevention

- 📌 Avoid the risk completely;
- 📌 Evaluate (i.e. Likelihood x Severity) those that cannot be avoided;
- 📌 Combat the residual risk(s) at source;
- 📌 Adapt the work to the individual;
- 📌 Adapt to technical progress;
- 📌 Replace / substitute;
- 📌 Develop a coherent prevention policy;
- 📌 Prioritise collective protection over individual protection;
- 📌 Give appropriate instructions to staff.

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## Hierarchy of control measures

When considering implementing control measures, the following options should be considered, from the top down, in order:

- 📦 Remove the hazard;
- 📦 Substitute the activity or process, where practicable, with one that is less risky;
- 📦 Control the risk(s) at source, by providing guards, enclosures, extraction systems etc.;
- 📦 Develop safe systems of work, normally in combination with other control measures;
- 📦 Provide adequate instruction, information and training;
- 📦 Provide adequate levels of supervision, to ensure that the control measures are used;
- 📦 Provide personal protective equipment (PPE), as a last resort.

When deciding what control measures may be required, consideration should also be given to any:

- 📦 legal requirements;
- 📦 codes of practice or guidance notes;
- 📦 industry standards.

If it is not reasonably practicable to implement the first measure, the next level should be tried, with the least favoured option being the provision of PPE. If complete protection is not afforded by one option although it is reasonably practicable to introduce it, then it should still be introduced, as it is often the case that a combination of measures is the most effective way to adequately control the risks.

Priority should always be given to measures that protect the whole workforce. The removal of the hazard from the workplace involves the least effort to manage effectively whereas the provision of personal protective equipment involves the greatest.

## Monitoring

All Supervisors and Managers in control of premises, in liaison with the Person(s) responsible for SHEF management, are responsible for monitoring the implementation of the recommended controls, assessing their efficiency and making any additional recommendations.

## Review

All risk assessments need to be kept up to date, which means that any 'significant or material' change(s) should lead to a re-assessment. They should always be reviewed and / or up-dated when:

- 📦 A set period of time has elapsed. As a rule-of-thumb, this can be based on the residual risk ranking, as follows:
  - 📦 High risk – annually, at least
  - 📦 Medium or normal risk – every two years, at least
  - 📦 Low risk – every three years, at least
- 📦 There has been an accident / incident in that risk; or
- 📦 New machinery / technology or working procedures have been introduced / changed; or
- 📦 There is reason to believe that the present assessment is no longer valid (e.g. a change in legislation etc.)

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## TEMPORARY, AGENCY AND MIGRANT WORKERS

### Policy statement

We will ensure that all workers are provided with the same level of health and safety protection, regardless of the transitory nature of their work, or their employment status.

In addition, we expect all providers of temporary workers to co-operate with us and communicate clearly, to ensure that risks to those workers are managed effectively, particularly where cultural and language differences could present health and safety issues.

### Definitions

- ❖ **Agency worker** – A worker engaged through, or by, an employment agency or bureau and supplied to a hiring employer on a temporary basis, either directly, under a contract of employment or indirectly, under a contract for service.
- ❖ **Migrant worker** – A worker who moves from one place to another, in order to find work or better living conditions.
- ❖ **Temporary worker** – A worker (full or part time) who is expected to leave the workplace within a specified period of time (e.g. freelance, contractual, seasonal, interim and casual staff) and who, generally (not always) do not derive the same benefits as permanent workers.

### Primary statutory provisions (latest versions)

- ❖ **Management of Health and Safety at Work Regulations**
- ❖ **Conduct of Employment Agencies and Employment Businesses Regulations**

### Assessment (generic) and provision of temporary and migrant worker management

Although data on the injury rates for these workers is anecdotal, it may have something to do with not having to identify injured workers, as temporary, permanent, or migrant and accordingly, no calculation exists for a temporary-worker injury rate, although we believe that both temporary and migrant workers may face a greater risk of being injured at work.

The transient nature of temporary workers is further complicated by the fear of investing time and money on someone who is unlikely to come back and as a result, if essential SHEF training is not provided or undertaken properly, temporary workers may not take the necessary precautions, due to lack of knowledge of the hazards.

Temporary and migrant workers may also be unaware of their legal duty to identify work they believe is unsafe, or may be less likely to speak up or unable to communicate their concerns.

Accordingly, before engaging any temporary or migrant worker(s) we will ensure that they:

- ❖ are communicated with, clearly and effectively, if necessary by providing information in other languages, visual formats or simple English, so that they understand what is required of them and both how and with whom, they can raise concerns
- ❖ are familiar with workplace risks and undergo formal induction training, using the [SHEF Induction Form \(see appendix\)](#), which will be presented in a clear and simple manner, so that they understand the relevant risk assessments and information and instructions they need to work safely and the control measures provided, to protect them;
- ❖ have the skills and / or occupational qualifications needed for the job, with any overseas qualifications being assessed for compatibility and the need for any additional training, to ensure competence, which will be added to the [SHEF Training Record \(see appendix\)](#);
- ❖ understand the importance that we place on behavioural safety, in the workplace, especially as some cultures may assume that accidents are always the fault of the worker, or just inevitable.

In relation to any agency or bureau supplying workers, we will also arrange for:

- ❖ occupational qualifications to be checked, to match the skills needed for the job;
- ❖ any joint requirement(s) for personal protective equipment, display screen equipment eyesight tests and any necessary health surveillance etc., to be addressed;
- ❖ reporting of relevant accidents to the relevant enforcing authority;

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## WORKPLACE HEALTH, SAFETY AND WELFARE

### Policy statement

We understand that we have a general duty to ensure, so far as is reasonably practicable, the health, safety and welfare of our staff in the workplace and to ensure that adequate welfare facilities are provided for people at work.

Accordingly, we aim to ensure that workplaces meet the needs of all members of our workforce, including people with disabilities and where necessary, doors, passageways, stairs, showers, washbasins, lavatories and workstations will be made accessible for disabled people.

### Definitions

- 📖 **Premises** – Any place, including an outdoor place
- 📖 **Traffic route** – Any route for pedestrian traffic, vehicles, or both and includes any stairs, fixed ladder, doorway, gateway, loading bay or ramp
- 📖 **Work** – Any work as an employee or self-employed person
- 📖 **Workplace** – Any premises where work is undertaken, including common parts of shared buildings, private roads and paths and temporary worksites, except workplaces involving construction work on construction sites (see separate procedure)

### Primary statutory provisions (latest versions)

- 📖 **Management of Health and Safety at Work Regulations**
- 📖 **Workplace (Health, Safety and Welfare) Regulations**

### Assessment (generic) and provision of workplace management

The **Workplace Regulations** tend to make recommendations regarding the minimum acceptable level of provision in most workplaces, except for construction work on construction sites and as such, should be seen as general guidelines and good practice, as opposed to requiring any assessment of risk.

Accordingly, listed below is a brief overview of some of the 'general' workplace provisions and more detailed information can be found in the Approved Code of Practice L24 and / or by contacting one of the Persons responsible for SHEF management.

A general [Premises \(workplace\) Checklist \(see appendix\)](#) has been provided for Supervisors and Managers in control of premises.

### Ventilation

Workplaces need to be adequately ventilated, preferably with fresh, clean air, drawn from a source outside the workplace, uncontaminated by discharges from flues, chimneys or other process outlets, and be circulated through the workrooms.

### Temperatures in indoor workplaces

Individual personal preference makes it difficult to specify a thermal environment which satisfies everyone, although for workplaces where the activity is mainly sedentary (e.g. offices), the temperature should normally be at least 16 °C and if work involves physical effort it should be at least 13 °C, unless other laws require lower temperatures.

### Work in hot or cold environments

The risk to the health of workers increases as conditions move further away from those generally accepted as comfortable and any consideration of the risk to workers' health, from working in either a hot or cold environment, needs to consider both personal and environmental factors.

### Lighting

Lighting should be sufficient to enable people to work and move about safely, including in an emergency.

### Cleanliness and waste materials

Every workplace and the furniture, furnishings and fittings should be kept clean and it should be possible to keep the surfaces of floors, walls and ceilings clean.

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### **Room dimensions and space**

Workrooms should have enough free space to allow people to move about with ease. The volume of the room, when empty, divided by the number of people normally working in it, should be at least 11 cubic metres.

### **Workstations and seating**

Workstations should be suitable for the people using them and for the work they do. Seating should give adequate support for the lower back and footrests should be provided for workers who cannot place their feet flat on the floor.

### **Maintenance**

The workplace, equipment, devices and systems should be maintained, to ensure health, safety and welfare.

### **Floors and traffic routes**

There should be sufficient traffic routes, of sufficient width and headroom, to allow people and vehicles to circulate safely with ease.

### **Falls into dangerous substances**

Dangerous substances in tanks, pits or other structures should be securely fenced or covered and traffic routes associated with them should be securely fenced.

### **Transparent or translucent doors, gates or walls and windows**

These should be made of safety material or be protected against breakage and if there is a danger of people coming into contact with it, it should be marked or incorporate features to make it apparent.

### **Windows**

These should be capable of being opened, closed or adjusted safely and when open, should not pose any undue risk to anyone.

### **Doors and gates**

Doors and gates should be suitably constructed and fitted with safety devices, if necessary.

### **Escalators and moving walkways**

These should function safely, be equipped with any necessary safety devices and be fitted with one or more emergency stop controls, which are easily identifiable and readily accessible.

### **Sanitary conveniences and washing facilities**

Suitable and sufficient sanitary conveniences and washing facilities should be provided at readily accessible places and kept clean and have running hot and cold or warm water, soap and clean towels or other means of cleaning or drying.

### **Drinking water**

An adequate supply of high-quality drinking water should be provided.

### **Accommodation for clothing and facilities for changing**

Adequate, suitable and secure space should be provided to store workers' own clothing and special clothing.

### **Facilities for rest and to eat meals**

Suitable and sufficient, readily accessible, rest facilities should be provided, with seats for workers to use during breaks. Suitable rest facilities should also be provided for pregnant women and nursing mothers, which should be near to sanitary facilities.

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## YOUNG PERSONS AND CHILDREN

### Policy statement

We understand that when employing a child or young person, whether for work experience, work, or as an apprentice, we have increased responsibilities for their health, safety and welfare.

Accordingly, we will ensure, so far as is reasonably practicable, the health, safety and welfare of all persons undergoing work experience, members of staff, including apprentices and contractors, **taking into account their prior knowledge, experience and maturity of the individual**, by assessing the risk(s) and documenting the normal and additional measures required, to ensure their health, safety and welfare.

### Definitions

- ☞ **Child** – Any person who has not yet reached the official minimum school leaving age (MSLA).

*Note: Pupils will reach the MSLA in the school year in which they turn 16.*

- ☞ **Work experience** – A number of activities that a young person undertakes, while working in a specific field or occupation, normally on a voluntary basis, to get a feel for a working environment.
- ☞ **Young person** – Any person who has not attained the age of 18.

### Primary statutory provisions (latest versions)

- ☞ **Management of Health and Safety at Work Regulations**
- ☞ **Health and Safety (Training for Employment) Regulations**
- ☞ **Education Act**

### Assessment (generic) and provision of workplace management

For many young persons the workplace will be a new environment, where they lack both experience and maturity. They are likely to be totally unaware of existing and potential workplace hazards and unfamiliar with 'obvious' risks and the behaviour expected of them in response.

Young people will, therefore, need additional support to allow them to carry out their work, without putting themselves and others at risk, which will require both tailored training and closer supervision.

### Workplace considerations

The Person(s) in Control of the Premises must consider the following issues:

- ☞ the layout of the workplace
- ☞ the physical, biological and chemical agents present
- ☞ the work equipment
- ☞ how the work and processes are organised
- ☞ the extent of health and safety training needed

### Work activity considerations

In addition, they will need to consider whether the work the young person will do:

- ☞ involves risks from particular agents, processes and work
- ☞ is beyond their physical or psychological capacity
- ☞ involves exposure to harmful substances or radiation
- ☞ involves risk of accidents that cannot reasonably be recognised or avoided by young people, due to their insufficient attention to safety or lack of experience or training
- ☞ has a risk to health from extreme cold, heat, noise or vibration

### Additional considerations

A child must never carry out such work involving risks from agents or processes.

A young person, who is not a child, can carry out work involving these risks if:

- ☞ the work is necessary for their training
- ☞ the work is properly supervised by a competent person
- ☞ the risks are reduced to the lowest level, so far as reasonably practicable.

We will always let the parents or guardians of any child, as well as their school, know the possible risks and the measures we have put in place to control them, including information contained in the relevant [Risk Assessment Form \(see appendix\)](#) and [SHEF Training Record \(see appendix\)](#).

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