



Homes
for Students®

VervLife®



Health and Safety Policy



HEALTH & SAFETY POLICY

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1. AMENDMENTS RECORD

1.1.1

1.1.2

General

Mr Martin Corbett must approve all amendments to this policy and comments made to Lighthouse Risk Services at the first instance on any changes or amendments required, before incorporating into the documentation. The person making the amendment is to complete the table below, so that a record can be kept of the status of the policy.

The policy will be made available to all staff to read.

Comments by staff as to the content and any suggested improvements should be addressed to management in the first instance.

Amendment	Amended by	Date amended
Review C	M Blackburn	31/7/17
Review D	M Blackburn	30/6/18
Review E	P Ryan	06/07/20
Review F	P Ryan	30/06/22
Review G	P Ryan	05/09/ 23
Review H	P Ryan	07/05/24
Review I	P Ryan	17/10/24

2. Section 1

2.1 Executive Summary

Homes for Students Limited are responsible for the day-to-day health & safety of large numbers of young people who live in the student accommodations we manage, and our teams who work in the student accommodations and our central support offices.

The Health and Safety at Work, etc Act 1974 (HWSA) is the principal piece of statute law regulating health and safety within the workplace, in addition this act creates duty holders and identifies who they owe a duty towards:

- The employer owes a duty to their employees to ensure, so far as is reasonably practicable, their health, safety and welfare at work,
- An employer owes a duty to ensure the health and safety of non-employees,
- Designers and manufacturers of articles or substances used at work have a duty of care towards the end users,
- Employees have a duty to themselves and others and must co-operate with their employer,
- The Act also prohibits anyone from misusing and/or interfering with safety equipment and prohibits employers from charging employees for things done to achieve legal compliance,
- Directors and senior managers can be charged with offences committed by their organization.

For clarity and in avoidance of doubt the “Responsible Person” and the “Duty Holder” will be described as follows:

The “Responsible Person” of the premises (either a building or any part of it) is the person who has control of the premises (“the responsible person”), which include building owners, leaseholders or cooperate interties as such the Clients would be the “Responsible Person”.

The “Duty Holder” is any person who is appointed to be responsible for specific aspects of a building or project. Their responsibility is to maintain an overall standard and quality this is conducive to good health and safety and quality of work. The duty holder therefore has a duty to their employees, their colleagues and ultimately the building users (students/residents) and passers-by. As such Homes for Students have been appointed the “Duty Holder” by the “Responsible Person”, however, this responsibility of the “Duty Holder” has been delegated to the General Managers who manage and oversee the day-to-day operation of their respective properties.

Similarly, The Management of Health and Safety at Work Regulations 1999 places various duties on the employer and will cover all workplaces and work activities:

- The requirement to carry out a suitable and sufficient risk assessment
- The employer must also make arrangements for the management of health and safety, develop procedures to deal with hazards identified and provide information and training to employees.

It must be noted that an employer is not required to provide a risk free or zero-risk workplace as such an environment simply does not exist and/or cannot exist, as there is risk associated with all places and activities, to this end Homes for Students duty is qualified by the phrase 'so far as is reasonably practicable'. However, whilst it is not possible to remove all risks within the working environment, those risks that have been identified will either be eliminated and/or managed through specific arrangements.

To this end and as required in ***Section 2(3) of the Act it states that every employer shall prepare (and as often as may be appropriate revise) a written statement of his general policy with respect to: the health and safety at work of his employees; and the organisation and arrangements in force for carrying out that policy and bring the statement and any revision of it to the notice of all his employees.***

As such the purpose of this document is to provide a framework for the management of health and safety within Homes for Students, so that the Homes for Students can fulfil its legal obligations under Section 2(3) of the Health and safety at Work Act 1974 and to demonstrate by means of a comprehensive policy that the company understands and acknowledges their legal obligations to their employees and any other persons who may be affected by the activities of the undertaking.

The Health and Safety Policy will be presented within three parts; the General Statement of Intent, the Organisation section and the arrangements:

1. **The General Statement of Intent** (Chief Executive Officer's Statement of Intent) will outline the importance that Homes for Students places on Health and Safety and the commitment that can be expected in relation to this.
2. **The Organisation** section will highlight the roles and responsibilities within Homes for Students which exist at all levels and will clearly outline the lines of responsibilities and accountability.
3. **The arrangements** section will provide the detail and outline the arrangements within Homes for Students to effectively manage health and safety, in addition it will outline the general arrangements that specifically relate to the management of health and safety and the arrangements that relate to individual health and safety topics and issues (In general terms how will risk assessments be carried out, the arrangements for ensuring the safety of contractors etc.)

The Health and Safety Policy will be formally reviewed at least once every twelve months, in addition any revisions and/or new subsequent change in legislation/regulations will be effectively

communicated to all relevant persons, should there be a significant change and/or updates made to the Safety Policy this will be brought to the attention of employees and others. The Policy will be disseminated by the company Operations Directors, to all Senior Portfolio Manager, Portfolio Managers and Operational Managers, for wider distribution to our properties, in addition all relevant updates and/or changes will also be disseminated via training, posters, Safety Alerts, booklets, departmental meetings, connect and through Safety briefings.

2.2 Homes for Students is committed to communicating effectively to all our employees and sub-contractors by providing alternative formats and languages where required. Where appropriate a buddy will be appointed to help communicate with the person and supervision appropriate to the risk.

2.3

2.4

CHIEF EXECUTIVE OFFICERS HEALTH AND SAFETY'S POLICY STATEMENT

Homes for Students acknowledges and accepts its statutory duty under The Health and Safety at Work Act 1974 (HWSA) and other relevant legislation to ensure, so far as is reasonably practicable, the health, safety, and welfare of all its employees and those who may be affected by its undertakings. In addition, Homes for Students recognises their legal requirement under the Management of the Health and Safety Regulations (MHSWR) to ensure that there are effective arrangements in place to 'plan, organize, control, monitor and review' the preventative and proactive measures as defined within Regulation 5.

Homes for Students will take steps, so far as is reasonably practicable, to meet their statutory health and safety responsibilities, paying particular attention to:

- The provision and maintenance of all buildings, plant, and work equipment
- The provision of adequate facilities to enable the safe handling, storage and transportation of articles and substances related to its work activities
- The provision of sufficient information, instruction, training, and supervision to enable the Company's Employees to avoid hazardous situations and contribute positively to their own health and safety at work
- The provision of safe access and egress to and from the workplace
- Prevent workplace accidents and cases of work-related ill health
- Actively manage and supervise health and safety at work
- The provision and maintenance of a healthy working environment including the adequacy of welfare facilities
- The inclusion of health and safety into the planning, organization, controlling, monitoring and review arrangements of the Company's management systems
- The use of suitable and sufficient risk assessment techniques to assess the health and safety risks applicable to its Employees and to others who may be affected by its work activities
- Review annually and revise, as necessary, this policy and provide adequate resources for its implementation

The intent of the document is to formally declare the means by which the management of Homes for Students ensures, so far as is reasonably practicable, the safety, health and welfare of employees, service users, visitors and all who come into contact with our Services and/ or may be affected by our activities. The Health and Safety Policy contains details of how the health, safety and welfare will be managed across all our properties and within our central services.

A Policy Statement (Statement of Intent) is unlikely to be successful unless it actively involves the people who work within Homes for Students as such, we will therefore seek to ensure effective consultation and communication through the business and ensure the statement is made available to all relevant 3rd parties.

Equally, it is the duty of every Employee to take reasonable care for the health and safety of themselves, their fellow workers, and/or other persons who may be affected by their actions at work as such it is

important that employees are familiar with and fully understand the arrangements for health and safety within Homes for Student and incorporate these as an integral part of the tasks performed while at work.

Signed: 

Martin Corbett
Chief Executive Officer



Kate Forester
Managing Director

Date: October 2024

Review Date: October 2025

3. Health and Safety Management system

Homes for Students recognised their legal duty and requirement under The Management of Health and Safety at Work Regulations 1999 to implement and have in place suitable arrangements for an effective management system in place to ensure, so far as is reasonably practicable the health, safety of our employees, students and other people affected by our work to ensure that risks identified are dealt with sensibly, reasonably, and proportionately.

Successful delivery can rarely be achieved through one-off intervention, but a successful delivery can be achieved through a collaborative approach through a sustained and systematic approach. As such, Homes for Students has adopted and implanted in line with the Health and Safety Executive Guidance HSG 65 '**Managing for Health and safety**' following the **Plan, Do, Check, Act framework** mythology. The implantation of this framework will encourage a common sense and practical approach across all aspects of Homes for Students whilst ensuring that this framework forms the basis of our everyday process and will be an integral part of workplace behaviours and attitudes.

The key actions covered within the Plan, Do, Check, Act framework are as follows:

PLAN:

- Policy
 - Homes for Students policies will be created/designed to meet legal requirements, to set a clear direction for health and safety and that of fire safety,
 - Which intern will allow for a proactive approach in the prevention of health and safety issues but will enable to facilitate a quick response where difficulties arise, and new risks are identified/introduced.
- Planning
 - This forms a critical and integral part of the implantation of the health and safety policy and all subsequent policies in place within Homes for students.
 - Adequate control of any risk can only be achieved through co-ordination and co-operation of **ALL** employees within homes for students as such this management system/framework will seek to identify risks, re-act to changing demands and crucially sustain a positive health and safety culture.

Do:

- Risk profiling
 - Homes for Students will assess the risk, identify what could cause harm, who it could harm and how but crucially steps will be implemented so far as is reasonably practicable to manage the associated risks.
 - Similarly, Homes for students will identify through a risk register property of concern, the associated risks and what mitigation measures are in place and/or what additional measures are required.
 - Homes for students will intern decide upon the preventative and protective measures and ensure they are in place and well communicated.
- Organising

- All employees within Homes for Students will be clear on their expectations with regards to health and safety,
 - This will be clearly communicated through various forums across the business and all employees are actively encouraged to 'speak up and Speak out' about health and safety issues that may arise.
- Implementation of the plan
 - Homes for students will ensure that all team members are competent to carry out their specific role through training and instruction.
 - The right tools and equipment will be provided to ensure that the 'job' can be done, in addition supervision will be in place to ensure that all arrangements are followed, and critically preventative and proactive measures will be implemented.

CHECK:

- Measure performance
 - Homes for students will adopt both an active and re-active method to monitor the health and safety performance across the portfolio and within central services.
 - The active method will be used to monitor the design, development, installation and operation of the management system which will be undertaken through both internal and external inspections.
 - The re-active method will be used to identify poor health and safety practice but will be used to identify good practice to be shared across the business.
- Investigate the causes of accidents, incidents and near misses
 - This will be undertaken as part of the re-active method to identify trends, lesson learnt but to also highlight good working practices and identify areas of strength.
 - The findings from such investigations will form the basis of actions taken to prevent a re-occurrence.
 - Homes for students undertake an effective investigation with a methodical, structured approach for information gathering, the retention/collation of information and the subsequent analysis.

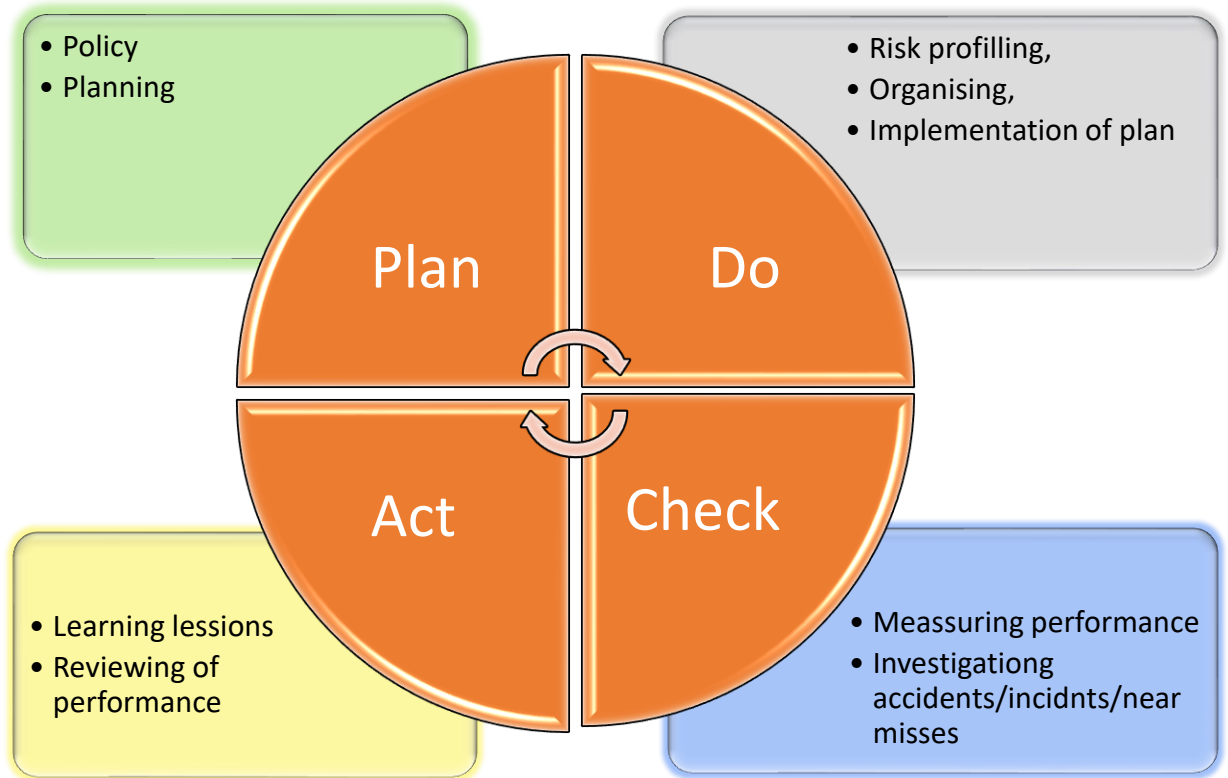
Act:

- Review performance
 - Homes for Students will examine information collated and learn from accidents, near misses, ill-health and errors.
 - A Re-visit on plans, policy documentation, risk assessments and CS-documentation will be undertaken to ensure they remain suitable and sufficient or if they require updating.
- Following a review, actions will be taken from lessons learnt which include fire risk assessment and health and safety audits.

The flow chart below illustrates the Plan, Do, Check, Act framework.

4.

Figure 1 The Plan, Do, Check, Act cycle



5.

Section 2

5.1 Organisational Responsibilities

5.2

Homes for Students recognised its duties under Section 2(3) of the Health and Safety at Work etc, Act 1974 (HSW Act) “Except in such cases as may be prescribed, it shall be the duty of every employer to prepare and as often as may be appropriate revise a written statement of his general policy with respect to the health and safety at work of his employees and the organisation and arrangements for the time being in force for carrying out that policy, and to bring the statement and any revision of it to the notice of all his employees.”.

The roles and responsibilities of the named persons with delegated responsibilities for the safety, health and welfare will be clearly outlined within Homes for Students, it must be noted that ALL employees at every level within Homes for Students will have to accept degrees of responsibility for carrying out the policy and that all employees have a duty to take care of their own safety at work and that of their colleagues and service users within Homes for Students

5.3 Board of Directors

5.4

The Board of Directors, in particular the Chief Executive Officer Martin Corbett accepts ultimate

responsibility and is accountable for the Health, Safety and Wellbeing within Homes for Students. In addition, the Board of Directors will be responsible for the strategic vision, development and monitoring of Health and Safety within Homes for Students.

The Board has delegated the responsibility of Health and Safety to the Managing Director Kate Forester to ensure that all reasonable measures are taken to provide a safe environment for all Homes for Students employees, students and those who may be affected by its undertakings.

5.4.1 SPECIFIC HEALTH & SAFETY RESPONSIBILITIES

Managing Director:

The Managing Director Kate Forester is to ensure that all reasonable measures are and have been taken to provide a safe environment for all Homes for Students employees, students and those who may be affected by its undertakings. To this end the Managing Director will ensure that:

- ❑ Enforcing Homes for Students policies and procedures in relation to that of health and safety.
- ❑ Ensuring that all employees within Homes for Students are made aware of and understand their specific role, duties and responsibilities with regards to the management of health and safety.
- ❑ Will update The Board and bring to their attention significant risks identified, specific resources required to ensure legal compliance.

In addition to the above the Managing Director will ensure:

- ❑ The provision and maintenance of all buildings, plant, and work equipment.
- ❑ The provision of adequate facilities to enable the safe handling, storage and transportation of articles and substances related to its work activities.
- ❑ The provision of sufficient information, instruction, training, and supervision to enable the Company's Employees to avoid hazardous situations and contribute positively to their own health and safety within the workplace.
- ❑ The provision of safe access and egress to and from the workplace.
- ❑ Prevent workplace accidents and cases of work-related ill health so far as is reasonably practicable,
- ❑ Actively manage and supervise health and safety within Homes for Students,
- ❑ The provision and maintenance of a healthy working environment including the adequacy of welfare facilities.

- ❑ The inclusion of health and safety into the planning, organization, controlling, monitoring, and review arrangements of the Company's management systems.
- ❑ The use of suitable and sufficient risk assessment techniques used and undertaken to assess the health and safety risks applicable to employees and to others who may be affected by its work activities.
- ❑ Review annually and revise, as necessary, this policy and
- ❑ Provide adequate resources for its implantation

Executive Team:

The Executive team who is led by the Managing Director will ensure that each member of the executive team is responsible for the health, safety, and wellbeing within their relevant department and in doing so ensuring that all reasonable measures are and have been taken to provide a safe environment for all Homes for Students employees, students and those who may be affected by its undertakings.

In addition, the Executive Team will assist the Managing Director to discharge her duties as delegated by the Board of Directors, it will be the responsibility of the Executive Team to bring to the Managing Directors attention any significant risks identified, and specific resources required to ensure legal compliance within Homes for Students.

Senior Leadership Team:

Reporting to the Executive Team, it is the SLT's responsibility to lead the business day to day to achieve our business objectives, and that of the health, safety and wellbeing of all employees and students. In addition, the SLT will continue to implement the decisions and vision of the Executive Team and embed change across the business.

It will be the responsibility of the Executive Team to bring to the Managing Directors attention any significant risks identified, and specific resources required to ensure legal compliance within Homes for Students.

To this end the SLT in particular the Operations Director will be responsible for and will:

- ❑ Provide necessary support to those responsible for implementing this policy.
- ❑ Ensure that safety action targets are set, and that management periodically review safety performance and achievements against the objectives set.
- ❑ Ensure that a pro-active safety culture and philosophy is developed and promoted, which will permeate into all activities undertaken and reach all personnel involved in them.
- ❑ Ensuring that any necessarily required funding is made available to enable health and safety matters to be effectively managed.

- ❑ Make sure that management meets with employees or their representatives at formal meetings when required so that health, safety, and welfare matters can be raised and resolved.
- ❑ Report and investigate all serious accidents and dangerous occurrences, suggesting actions to prevent recurrence.
- ❑ Implement this policy within the office area and activities under their control.
- ❑ Ensure that all necessary Risk Assessments that relate to the company's activities are carried out, either in-house or by external consultants.
- ❑ Ensuring that all items of plant, machinery, and equipment (to include the mains electrical system, and facilities for heating, lighting and ventilation) receive the appropriate levels of service and maintenance.
- ❑ Will ensure the upkeep of all fire precautions, arranging evacuation practice, keeping records etc., and ensuring the adequacy of the first aid arrangements.
- ❑ Will maintain accident figures/statistics for the company, watching for any trends whereby corrective actions may be necessary.
- ❑ Have a responsibility for providing health and safety updates and support to all levels of management within the company and to employees as appropriate.
- ❑ Will co-ordinate the health and safety activities and requirements of management, recommending changes in policy, establishing, and maintaining the safety system.
- ❑ Will ensure that duties are understood and are carried out (whether by management or others), with the results becoming part of the overall safety management programme.
- ❑ Will ensure that all operational management are developing and promoting a positive health and safety culture,
- ❑ Will ensure that all operational management are uploading and addressing actions within the audits undertaken and ensuring they are completed within the time specified
- ❑ Will ensure that effective means of communication are available to employees so that they can raise health, safety or welfare matters

Line Managers

As previously stated, the "Duty Holder" is any person who is appointed to be responsible for specific aspects of a building or project. Their responsibility is to maintain an overall standard and quality this is conducive to good health and safety and quality of work. The duty holder therefore has a duty to their employees, their colleagues and ultimately the building users (students/residents) and passers-

by. As such Homes for Students have been appointed the “Duty Holder” by the “Responsible Person”, however, this responsibility of the “Duty Holder” has been delegated to Line Managers and to General Managers who manage and oversee the day-to-day operation of their respective properties.

It will be the exception of the Executive team that **ALL** line managers which include both operational and central services line managers will be responsible for the health, safety and wellbeing of their respective teams, students and visitors and will have the responsibility to adopt the Health and Safety Policy, all procedures which includes any specific documentation and/or arrangements within their relevant areas of control.

As such, **ALL** line manager will co-operate with the SLT and/or the Executive Team in relation to health and safety and as such will be accountable for any tasks that may be delegated to them. It is the expectation that health and safety will be given a high priority and is adopted within their day to day undertaking which will form an integral part of the overall management of health and safety.

The success of overall management of health and safety throughout the company relies on the positive contribution of those with designated responsibilities as such it is expected that there is strong resolve to continual improvement within health and safety and displaying our value ‘Own it’ on a daily basis.

To this end, the Line Manager are responsible for the following: -

- ❑ Having a delegated direct responsibility for the implementing this policy within all activities under control.
- ❑ Periodically reviewing the effectiveness of the organisation’s policy on health and safety, ensuring any necessary changes are made due to any alterations in plant, equipment, and process changes.
- ❑ Ensuring that employees have access to means of communication whereby they can raise any health, safety, or welfare matter.
- ❑ Ensuring that any safety training matters are identified and scheduled for action at the necessary intervals, with records held.
- ❑ Ensuring that all fire precautions are maintained that employees receive training in fire evacuation procedures and that fire actions are recorded.
- ❑ Making sure that all employees are made aware of first aid arrangements.
- ❑ Ensuring that all injury accidents and dangerous occurrences are investigated, recorded, and reported to the H.S.E., as necessary via the Directors.
- ❑ Ensuring that employees are provided with information on any risks to their health and what control measures are in place (including the use of PPE).
- ❑ Ensuring that plant and machinery is properly maintained, adequately guarded and that ‘safe systems’ of work are in operation and used.

- ❑ Ensuring the integrity of the electrical supply and all portable electrical equipment, keeping records in both cases.
- ❑ Ensuring that employees do not use any machine or other equipment unless they have been suitably trained in its use.
- ❑ Ensure that all work is fully planned and co-ordinated.
- ❑ Ensure that all operatives are given adequate information, training and instruction which will allow them to undertake their work safely.
- ❑ Ensure that all operatives have suitable and well-maintained plant and work equipment.
- ❑ Ensure that all operatives are issued with the appropriate level of PPE for the work at hand.

Ensure that all COSHH Assessments have been carried out on the hazardous substances used by the company.

- ❑ In particular the General Managers are to ensure that all aspects of compliance are addressed and that pre planned maintenance (PPM's) are completed and recorded within the time specified.
- ❑ Ensure that all fire risk assessments and H&S audits are undertaken, and any significant findings are shared and reported.
- ❑ Ensure that all actions identified within external audits are uploaded and are addressed and ensuring they are completed within the time specified

Employees

The Health and Safety at Work Act 1974 provides a comprehensive and integrated piece of legislation dealing with the health and safety of people at work and the protection of the public from work activities. The act imposed a duty of care on **everyone** at work related to their roles. This includes employers, employees, owners, occupiers, designers, suppliers and manufacturers of articles or substances for use at work. The requirements are spelt out in Regulations.

Employees at HFS are required to and

- ❑ Must take reasonable care for the health and safety of themselves and of any other person who may be affected by their actions or omissions at work
- ❑ Must report to their line manager any unsafe practices or systems of work, unsafe working conditions, near misses, damage to plant, machinery or equipment, accidents, violent incidents or dangerous occurrences;

- ❑ Will not to intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety and welfare;
- ❑ They should suggest ways and play an active part in the elimination of hazards, improving working methods and adopt a proactive approach to health and safety in general;
- ❑ They are to make themselves aware of the Health and Safety Policy and/or documents that relate to health and safety matters this is to include fire safety;
- ❑ They must ensure that there is a good level of housekeeping and that work areas is kept clean and tidy, and likewise ensure that corridors, floors and doorways are kept clear and free from obstructions;
- ❑ They must provide to the Human Resource Department a complete set of notes/certification relating to any safety training or seminar they have attended.
- ❑ They must be aware of emergency procedures i.e., first aid and fire drill procedures put into place by Management
- ❑ Will be accountable for any tasks that may be delegated.

The National Health and Safety Manager

The National Health and Safety Manager has a central co-ordinating role in relation to general health and safety and that of fire safety, with particular emphasis on safety problems, concerns, issues that may arise and the requirement and application of relevant legislation. To this end the National Health and Safety Manager will develop and promote Homes for Students Health and Safety Policy, the strategic plane, and the development of an effective safety management system. In addition, the National Health and Safety Manager will assist/support the Managing Director and the Board of Directors to discharge their lawful duties as require by the Health and Safety at Work Act 1974.

The National Health and Safety Manager will report to the Compliance and Procurement Director and will be assisted by the Health and Safety Advisor to ensure:

- ❑ The effective implementation of Health and Safety Legislation on behalf of Homes for Students,
- ❑ Create and implement new health and safety SOP's, Policies and procedures as required to improve compliance within the business and/or react to new statutory requirements.
- ❑ Ensure that relating to Health and safety continue to underpin the requirements of The National Code, and that they are understood across the business by the users.
- ❑ Report on Health and safety performance.
- ❑ Promote a positive compliance culture within Homes for Students,
- ❑ Escalate any Health and Safety non-compliance areas as a priority

In additional the National Health and Safety Manager and the Health and Safety Team will support the SLT in discharging their duties and will:

- ❑ Provide necessary support to those responsible for implementing this policy.

- ❑ Ensure that safety action targets are set, and that management periodically review safety performance and achievements against the objectives set.
- ❑ Ensure that a pro-active safety culture and philosophy is developed and promoted, which will permeate into all activities undertaken and reach all personnel involved in them.
- ❑ Ensuring that any necessarily required funding is made available to enable health and safety matters to be effectively managed.
- ❑ Make sure that management meets with employees or their representatives at formal meetings when required so that health, safety, and welfare matters can be raised and resolved.
- ❑ Report and investigate all serious accidents and dangerous occurrences, suggesting actions to prevent recurrence.
- ❑ Implement this policy within the office area and activities under their control.
- ❑ Ensure that all necessary Risk Assessments that relate to the company's activities are carried out, either in-house or by external consultants.
- ❑ Ensuring that all items of plant, machinery, and equipment (to include the mains electrical system, and facilities for heating, lighting and ventilation) receive the appropriate levels of service and maintenance.
- ❑ Ensure the upkeep of all fire precautions, arranging evacuation practice, keeping records etc., and ensuring the adequacy of the first aid arrangements.
- ❑ Maintain accident figures/statistics for the company, watching for any trends whereby corrective actions may be necessary.
- ❑ Have a responsibility for providing health and safety updates and support to all levels of management within the company and to employees as appropriate.
- ❑ Co-ordinate the health and safety activities and requirements of management, recommending changes in policy, establishing, and maintaining the safety system.
- ❑ Ensure that duties are understood and are carried out (whether by management or others), with the results becoming part of the overall safety management programme.
- ❑ Ensure that all operational management are developing and promoting a positive health and safety culture,
- ❑ Ensure that all operational management are uploading and addressing actions within the audits undertaken and ensuring they are completed within the time specified.

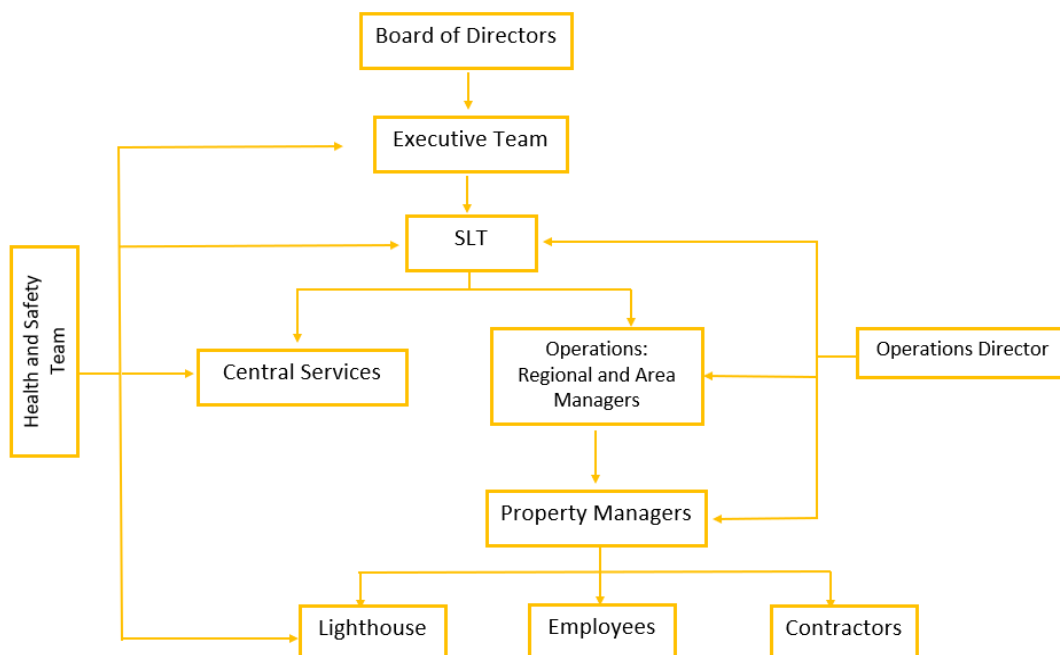
LIGHTHOUSE (HEALTH AND SAFETY EXTERNAL ADVISORS)

Lighthouse Risk Services LLP has been appointed as our competent person as required under Regulation 7 of the Management of Health and Safety at Work Regulations 1999.

The service offered by Lighthouse Risk Services LLP cannot alter responsibilities under statute or common law but is intended as an aid to help fulfil such duties. Health and Safety Consultants are Members of the Institute of Occupational Safety and Health (IOSH), and Lighthouse Risk Services LLP meets its responsibilities by:

- Undertaking health and safety audits in order to help identify hazardous operations, breaches of legislation and non-compliance with recognised guidance and standards.
- Preparing a Health and Safety Manual to assist our organisation manage health and safety and to recommend amendments when necessary to encompass changes in legislation.
- Providing advice and guidance on all aspects of health, safety, and welfare.
- Providing advice and guidance in the event of a major injury accident or dangerous occurrence and undertaking an investigation if necessary.
- Recommending other specialist advice, training, surveys, examinations, etc. where necessary.
- Liaising with enforcement authorities/other interested parties on our behalf.
- Providing advice and assistance in undertaking risk assessments.
- Recommending training for specific groups of employees to ensure they are familiar with their responsibilities and the standards expected.

The diagram below represents the management structure within Homes for Students.



6. Section 3

1. Health and Safety Communication and Co-operation

6.1.1 H&S Management System Information

The National Health and Safety Manager will maintain an up-to-date library of information on H&S matters from the following sources:

- ▶ Technical Indices, including legislative changes
- ▶ British Safety Council
- ▶ IOSH Health and Safety Practitioner magazine
- ▶ HSE Site Safety news
- ▶ H&S Construction News
- ▶ RoSPA.
- ▶ External Audit Findings
- ▶ Industry best practice

6.1.2 Legal requirements

All Health and Safety Legislation relevant to Homes for Students, is documented within the H&S procedures. These procedures are kept up to date with information received on a regular basis from sources as detailed above.

6.1.3 Information Flow

Information will be disseminated by the company National Health and Safety Manager, to all Regional Operation Directors, Client Portfolio Directors, Senior Portfolio Managers, Portfolio Managers and Operations Managers, and General Managers, who will decide the target groups for this information and the method of communicating this information.

Information will also be disseminated via training, posters, Safety Alerts, booklets, departmental meetings, intranet, and Safety briefings.

We are committed to communicating effectively to all our employees and sub-contractors by providing alternative formats and languages where required.

Where appropriate a buddy will be appointed to help communicate with the person and supervision appropriate to the risk.

6.1.4 Mandatory Information

The following information is considered essential Safety information, which must be available to all employees, including agency, temporary workers, and contractors.

- ▶ The company H&S Policy
- ▶ The hazards, risks and controls identified by Risk Assessments.
- ▶ The method of evacuation of the workplace in case of serious or imminent danger.
- ▶ Identity of competent person for evacuation, first aid, permits issue or accident reporting.
- ▶ The risks notified by others working on the premises.

All revisions of the company H&S Policy and Procedures shall be brought to the attention of all staff via team meetings and via Connect.

6.1.5

6.1.6 Information Dissemination.

Safety information will be disseminated by:

- ▶ H&S Policy and Procedures.
- ▶ Issue of Employee Safety booklet
 - ▶ Displaying information on Safety notice boards
 - ▶ By making Health and Safety an agenda item on all routine, departmental or Management meetings.
 - ▶ Poster campaigns.
 - ▶ Printed Safety Alerts & Regular SHEQ Newsletter
 - ▶ Team Briefings
 - ▶ Training, including induction.
 - ▶ Company newsletter
 - ▶ Via blogs and webinars
 - ▶ Issue of new / updated H&S Policy and Procedures.
- ▶ Site / office Safety plans
- ▶ Notices and updates on Health and Safety matters will be available on Connect

6.1.7

6.1.8 Communication with External Organisations.

From time to time, Homes for Students will need to provide H&S information to external organisations. Such as:

- ▶ H&S Policy and Procedures.
- ▶ Hazardous material or substances contained within the premises
- ▶ Risk to others (Public consideration).
- ▶ Statutory Notifications, relevant information required by statutory bodies such as the HSE or Fire service
- ▶ General Safety enquires.

The above information is available upon request to the company National Health and Safety Manager. Policies are available on the company internet site.

6.1.9 Consultation with Staff on Health and Safety Matters.

6.1.10

The Managing Director is responsible for ensuring that all Health and Safety matters are effectively communicated to all employees and are consulted in timely manner on Health and Safety matters, to this end

All employees within Homes for Students are in regular communication with their line managers and monthly team meetings with line managers are undertaken which include information and action points on health and safety, employees are encouraged to play an active role during these meetings. Line managers provide an opportunity for their respective teams to raise any fire safety and health and safety concern and/or best practices that can be shared which can if needed be escalated to the various department heads and/or to the health and safety team. In addition to the team meetings, Homes for students as a clear procedure in place to report any incidents, accidents, unsafe acts, practices and near misses across the business which is dealt with and investigated by the health and safety team.

The team will be consulted, but not exclusively, on the following:

- ▶ Examination of accidents and action or recommendations following an investigation.
- ▶ Reviewing of Safety Inspections, audits or HSE reports.
- ▶ Identification and monitoring of Safety Training.
- ▶ Discussion of new Safety legislation and changes needed to comply with it.

- ▶ Monitoring the implementation of H&S Procedures and adequacy of H&S communication in the workplace.
- ▶ Monitoring the Property with and review of Risk Assessments.
- ▶ Reviewing of H&S strategies within the organisation.
- ▶ Reviewing of H&S policy and procedures

All employees have access to and will be notified on matters relating to health and safety within Homes for Students, to achieve this information relating to health and safety can be found:

- ▶ Weekly H&S drop-in session,
- ▶ Monthly H&S blogs on Connect,
- ▶ H&S webinars,
- ▶ H&S team conduct property health checks for internal H&S auditing,
- ▶ H&S team attend Regional meetings,
- ▶ The Health and Safety and Fire Risk Assessment Monthly Update will be produced to all Regional Operation Directors, Client Portfolio Directors and Senior Portfolio Managers within the first week of the month
- ▶ Monthly compliance report is produced to provide a high-level overview of audit actions, which is to be interpreted and actioned accordingly by the relevant line managers.

6.1.11

6.2 2.0 Training

Training is regarded as an ongoing requirement to ensure that members of staff, at all levels of responsibility, have adequate instruction and information relating to their function.

Health and safety training needs will be identified in any of the following ways.

- ▶ Company Risk Assessment process
- ▶ Information from accident and near miss investigations
- ▶ Information from safety investigations
- ▶ Safety Committee group meetings
- ▶ H&S legislation
- ▶ Personnel Training Matrix
- ▶ Toolbox Talks
- ▶ Astute (the company e-learning platform)
- ▶ Internal Training Attendance Record

Minimum levels of competency are described in the company job description / role profile.

Particular attention must be given to employees categorised as special groups when identifying training needs. Special groups include:

- ▶ Young, inexperienced, or new employees.
- ▶ Employees with special needs i.e., Impaired mobility, vision, hearing, limited literacy/ language skills.
- ▶ Employees who are to be promoted or redeployed.

- ▶ Employees promoted to positions with crucial responsibilities for health and safety.
- ▶ Employees who work alone for long periods of time or work shifts.
- ▶ Employees who cover for absent personnel.
- ▶ Employees exposed to new work equipment, new technology, or new or modified systems of work.
- ▶ Temporary employees or those on fixed duration contracts.
- ▶ New or expectant mothers.

6.2.1 H&S Training Plan.

An annual H&S training plan shall be developed in conjunction with the People Team which will take form of training matrix which shall be approved by the company board of directors. Following the approval of the training plan it shall be maintained by the company National Health and Safety Manager and People Development Manager.

It will be the responsibility of **ALL** line managers within operations and within central services to ensure that all employee training is completed and/or undertaken as required, similarly it will be the responsibility of the People Development Manager to ensure that the training is available for Homes for Students employees.

All H&S risk critical training shall be conducted by a competent person as outlined within legislation and who has completed a teacher training and/or train the trainer qualification.

6.2.2 H&S Training and induction

All new employees will undertake an induction process which will be controlled and monitored within the People Team, similarly all employees transferring to new locations, shall be given an H&S induction. The induction shall be undertaken by the General Manager and in the absence of a General Manager the H&S induction will be undertaken by the relevant Operations/Portfolio and/or Senior Portfolio Manager, Portfolio Directors and Operational Directors.

6.2.3 H&S Training Records

Records of any H&S training conducted shall be forwarded to the People Team who will hold this information centrally and shall update individuals' personal training records.

In addition to this the People Team have a comprehensive training matrix in place that records all risk critical training along with the frequency for which this needs to be undertaken.

Records should be kept on site.

6.2.4 Competences

All persons employed by Homes for Students shall be demonstrably competent to undertake their duties and work activities. These include management and supervisory staff, tradesmen and contractors. In all cases relevant H&S competence is required.

Where appropriate an industry relevant qualification which demonstrates H&S competence shall be required, these may include:

- ▶ CSCS
- ▶ Safe contractor
- ▶ IOSH Working Safely
- ▶ IOSH Managing Safely

- ▶ NEBOSH certification (for compliance professionals)

6.3 3.0 Health and Safety Management Function

The responsibility for the provision of H&S, throughout the Company is that of the Company Managing Director (MD).

The appointed General Manager will be the focal point for the production and development of the Company's H&S Management System and will directly control the H&S Policy and procedures.

Duties and responsibilities will include:

- ▶ Production, control and review of all H&S Policies, Procedures, Manuals and Employee Booklets which comprise the Company H&S Management Systems.
- ▶ Liaise with the Development Director and Head of Development to ensure direct control of the H&S, by providing services to all business locations and employees.
- ▶ Setting programs to implement H&S objectives, ensuring they are carried out and their effectiveness reviewed.
- ▶ Ensuring information on H&S is available and freely communicated to all business locations and employees.
- ▶ Implementing the aims of H&S training plans by carrying out the training or advising on specialist external agencies to provide the training.
- ▶ Ensuring all accidents or loss potential incidents are investigated and reported within and outside of the organisation.
- ▶ Producing reports as required on H&S
- ▶ Setting out an Audit Programme to ensure Property with Company standards and procedures.

6.3.1 Authority

The Managing Director has delegated authority for the success of the company's management of health and safety to the Compliance & Procurement Director and the Operations Director. The Compliance & Procurement Director and Operations Director have the authority to make decisions relating to H&S issues and to ultimately place probation on unsafe acts and practices.

The authority and responsibility for the day-to-day management of Health & Safety is delegated to individual line managers, and to duty holders who have a specific health and safety responsibility and focus in their job roles.

6.3.2 Accountability

There shall be effective management structures and arrangements for delivering the H&S policy and for allowing people to make a responsible and informed contribution to the health and safety effort. Accountability and responsibility for health and safety issues are defined.

Those who have accountability shall have appropriate authority to exercise that accountability. Where interaction between departments or organisations has an effect on the risk or is necessary for control of risk then responsibilities and arrangements between the departments or organisations shall be clearly defined. Health and safety issues shall be addressed at the specification, design, development and implementation phases in all planning, projects and working practices within the company and in its dealings with suppliers and contractors.

The Managing Director, the Executive team and Senior Leadership team and the Board of

Directors are responsible for health and safety leadership of the organisation and are responsible for ensuring that the company is effectively managing its health and safety risks. The CEO is ultimately accountable for the H&S performance of the organisation.

Individual line managers have delegated responsibility and authority for managing H&S for activities under their control and are held accountable to the board of directors for H&S performance. Poor H&S performance will be managed through the company disciplinary procedure.

6.3.3 Health Advice

Detailed advice on matters of workplace occupational health will be provided by an external health provider nominated by Homes for Students.

6.3.4 Specialist Advice

Consultants will be employed on a contract basis for the provision of the specialist advice, where it is not available from the National Health & Safety Manager.

The Company National Health & Safety Manager will nominate the specialist consultant as and when required.

6.3.5 Management

Management Representatives will be trained and appointed for all major site and office locations.

6.3.6 Safety Inspections and Visits

Site safety inspections will be carried out to assess the standards of Health and Safety Management on site.

6.3.7 Improvement actions

During inspections points requiring attention for improvement will be noted as with an agreed timescale for improvement and the name of the person who will action them.

6.3.8 Prohibition Actions

If during the inspection any substandard conditions or actions are observed, which present a danger to personnel or environment and/or contravene the law, the General Manager is empowered to insist the work is halted and must then issue the Inspection Report as an internal Prohibition Notice.

The Inspection Report must be clearly marked as an internal Prohibition Notice, stating clearly the observations and the recommendations to correct the deficiencies. The Inspection Report must also state in bold that work must not be recommenced until the deficiencies have been rectified.

All information/actions shall be reported in H&S Management reports.

Where an Inspection Report is issued as an Internal Prohibition Notice the General Manager must contact immediately:

- ▶ National Health & Safety Manager
- ▶ Compliance and Procurement Director
- ▶ The Executive Team

► Operations Director

6.3.9 Training

Training to ensure the competency and continuing professional development of the General Manager will be the responsibility of the Operations Director, the National Health & Safety Manager, and the People Development Manager.

The National Health & Safety Manager will take all the necessary steps to ensure they keep abreast of all legal, advisory and cultural changes in Safety and Health Management. In order to fulfil this requirement, the National Health and Safety Manager will work alongside The Compliance and Procurement Director to ensure that they are fully aware of any significant changes in legislation that would affect day-to-day operations.

4. Control of Visitors and Contractors

6.3.10 Visitors Registration

All visitors must report to a reception area which should be signposted at the entrance to the premises. All visitors must sign in and out of site using the Site Visit Record Sheet. A procedure for registration of visitors must be in place and this is to be operated by reception or other staff to ensure the safety of the visitor.

Visitors should be instructed to stay with their host at all times unless they are a Company employee visiting another premise which they are familiar with.

This is covered by internal SOP: [CS-HS-208 Form 01](#), CS-HS-208 Form 02, [CS-HS-208 Form 03](#)

6.3.11 Visitors Safety Briefing

Reception or other staff must give the visitor a short briefing which covers the following points as a minimum:

- i) Stay with your host
- ii) You are subject to the H&S at Work Act and Company rules whilst on the premises.
- iii) Your host will advise you of any site rules of PPE you must wear
- iv) If the fire alarm sounds, please follow the instructions of your host.
- v) Please observe the 'No Smoking' policy.
- vi) Please observe site speed limited.
- vii) The location of toilets.

6.3.12 Visitors Pass

A Visitors Pass must be issued to the visitor which must be worn at all times and returned to reception prior to leaving.

6.3.13

6.3.14 Contractors Work on Company Premises

6.3.15

Due to the scale and complexity of the properties under Homes for Students, there will be a requirement to have a variety of external contractors attending our properties to undertake specific works which may include but not limited to building maintenance, statutory services and/or remedial works, equipment installation, refurbishments, surveys etc.

For clarity and as identified Contractors **are professionals who provide skills or services to companies for a set period, they may be contracted for a set number of hours, a certain timeframe, or the**

duration of a project. Contractors can be self-employed, and work independently as sole traders, or they can run their own limited company.

It will be the policy of Homes for Students that a mandatory permit to work system will be in operation whereby all contractors will report to a reception area which will be signposted at the entrance to the premises, all contractors are required to sign in and out of site using the Site Visit Record Sheet. In addition to this the contractors will be required to complete the permit to work, it must be noted that failure to do so will result in no works being undertaken at the property.

Please find below the permit works that maybe required to be completed prior to any works being undertaken:

- Permit to Work is required for all works and needs to be logged in the Permit log (CS-HS-329 Form 02 - Permit Log)
- Working at heights Permit to Work (CS-HS-329-Form 03)
- Hot Works Permit (CS-HS-308-Form 11).

6.3.16 Contractor Safety Briefing.

6.3.17

Reception or other staff must give the visitor a short briefing which covers the following points as a minimum:

- 1) Stay with your host
- 2) You are subject to the Health and Safety at Work etc Act 1974, other relevant legislation, and Company rules whilst on the premises.
- 3) Your host will advise you of any site rules of PPE you must wear
- 4) If the fire alarm sounds, please follow the instructions of your host.
- 5) Please observe the 'No Smoking' policy.
- 6) Please observe site speed limited.
- 7) The location of toilets.

In addition to the above a Visitors Pass must be issued to the visitor which must be worn at all times and returned to reception prior to leaving.

6.3.18 Contractor Co-ordinator

At all Company premises where contractors are engaged, a Site Safety Officer will be appointed to control contract works.

6.3.19 Contractors Assessment

All contractors that attend Homes for Students properties will undergo a vetting process to ensure that they have suitable and sufficient risk assessments, RAMS, insurance policies and in addition competence checks on individual engineers will be undertaken prior to any works being undertaken. Regular maintenance contractors or contractors engaged for construction work must have a health and safety file on site containing this information.

The General Manager must ensure that contractors engaged to carry out maintenance; repairs, etc. are competent to do the work and carry it out without risk to themselves, students/residents and/or Homes for Students employees. All contractors that undertake works

within Homes for Students properties must be on the approved list of contractors and undergone the relevant assessment.

Contractors such as cleaners, caterers, agency staff etc. are not required to complete a health and safety questionnaire, however, General Managers must satisfy themselves that they are competent to undertake the required task.

6.3.20 Conditions for the Employment of Contractors

The General Managers are responsible for the safe operation of their sites and will require contractors to act in the manner set out below, all matters that have a bearing on the safety on site of staff and other parties.

6.3.21 Contractors Safety

As required under the Under Health and Safety at Work etc Act 1974, the Management of Health and Safety at Work Regulations 1999 and other relevant legislation. Homes for Students has robust policies and procedures in place to manage the safety and wellbeing of contractors that attend our properties, however the contractors attending our properties have an obligation and required by law to ensure their safety and that of other and to this end contractors attending our properties must provide the following:

- ▶ Risk Assessment and Method Statement for construction/ maintenance work.
- ▶ COSHH Assessments for any hazardous substances used.
- ▶ Details of any accidents which occur on company premises.
- ▶ Contractors' safety performance must be monitored at periodic intervals by completion of an MSR Safety Inspection Report.
- ▶ Contractors shall comply with all relevant Health & Safety Law and Health & Safety Rules and provide copies of current Public and Employee Liability Insurance and a Method Statement on request.
- ▶ Contractors must work in accordance with the Method Statement and Permit to Work/agreed Safe System of Work documentation at all times.
- ▶ Contractors must only do the work specified and no other.
- ▶ Contractors must ensure that your work area is in a safe and tidy condition at all times.
- ▶ All persons under your control shall be competent to work safely.
- ▶ Contractors are responsible for ensuring that appropriate Portable Fire Appliances are provided, where this forms part of the contract that all persons under their control know the Fire Procedures for the site and location of the nearest Portable Fire Appliance.
 - ▶ The normal means of escape must not be obstructed without temporary alternative arrangements being made and approved.
 - ▶ Faulty tools and equipment must not be brought onto site.
 - ▶ 110V CTE electrical tools are preferred. If 240V tools are used, they must be double insulated, and RCD protected.
 - ▶ All extension leads must be properly terminated with the appropriate plugs/sockets and be otherwise un-jointed.
 - ▶ Suitable Personal Protective Equipment shall be worn when necessary and must be properly maintained.

5. Lone Working ("LW")

Lone working may be defined as any work activity, which is intended to be carried out or when the individual becomes isolated from other workers and may not have close or direct supervision.

The Company will ensure that all lone working activities have been identified. Consideration will

be given to the following activities:

- ▶ Situations where only one person works on the premises, e.g., home workers, site managers manning a site alone, working with service users etc.
- ▶ People working separately from others e.g., rent collectors, housing officers, surveyors, home help, site representatives, mobile scheme visitors, customer services etc.
- ▶ People working outside normal working hours e.g., cleaners, security, maintenance workers, departmental specific call outs.
- ▶ People working on sites carrying out plant installations, lift repairs, painting, decorating, window cleaning.

6.3.22 High Risk Activities or Situations

The Company will identify all activities that may be considered high risk. Individual employees will not conduct these activities unless accompanied by another person involved in the work such as:

- ▶ Visiting clients' homes that have known history of mental health issues, violence and aggression, staff must check the company caution register that can be located on the company intranet.
- ▶ Requested assistance to persons known to be under the influence of alcohol or drugs.
- ▶ Visiting or working with service users that have fled domestic violence.
- ▶ Visiting dangerous void properties.
- ▶ Parking or having to pass through poorly lit, car parks or other areas where there is a known risk of vagrants.
- ▶ Working in confined spaces e.g., entry into storage tanks, access chambers, boilers etc.
- ▶ Working on or near high voltage electrical systems.
- ▶ Working in extreme weather conditions.
- ▶ Cash handling that may attract a criminal element.
- ▶ Staff who have an existing medical condition that may increase their risk of injury if working alone.

6.3.23 Other High-Risk Situations when Lone Working

Other high-risk situations that the company needs to consider for lone workers are:

- ▶ Dealing with discarded needles, either needle stick injury or actions if on finding discarded syringes.
- ▶ The actions to be carried out on discovering suspected illegal substances.
- ▶ Working near or dealing with bodily fluids.
- ▶ Working with ladders

6.3.24 Driving Risk

Managers must be satisfied that their staff are sufficiently fit and healthy to drive safely and not put themselves or other at risk.

Managers must ensure that:

- ▶ Validity of the driving licence, this must be checked on recruitment and periodically thereafter.
- ▶ The member of staff is medically fit to drive.
- ▶ That all at-work drivers aware of company policy on work-related road safety, and do they understand what is expected of them.

Drivers Must:

- ▶ Obey Highway code
- ▶ Have a current driving licence, valid for the type of vehicle to be driven.
- ▶ Ensure that valid insurance is in place, for work use.
- ▶ Ensure that the vehicle is roadworthy, has current MOT and is serviced in line with manufacturer's recommendation.
- ▶ Regular safety check on lights, tyres, windscreen wipers, and fluid levels must be carried out on a regular basis.
- ▶ It is illegal to use a mobile phone without a fitted hands-free kit whilst driving. The company does not encourage the use of any mobile telephone system whilst driving on behalf of the company, however, if necessary, they must only be used within the confines of the law. It will therefore be deemed as a disciplinary offence should anyone be found breaching the law or not following Company policy. Any fines imposed on individuals by the police/court system will be the responsibility of the employee alone.

6.3.25

6.3.26 Responsibility

6.3.27

The implementation of this procedure is mandatory at all company premises. Site managers have a duty of care to visitors (lawful or trespassers) on their premises to ensure that they come to no harm.

Working alone is specifically prohibited by law in some particularly dangerous situations, such as working in confined spaces and actively discouraged where working with live electrical conductors.

The hazards and risks that the LW face shall be assessed and if they are found to be high then the systems of work will be adjusted to eliminate the hazard(s) and / or reduce the residual risk(s) to as low as is reasonably practicable.

The training provided to the LW, and the level of competence they will need to demonstrate before being allowed to work alone, remotely, or isolated, is therefore especially important.

Managers must ensure that a Lone Working Risk Assessment is in place for each lone worker, and that all control measures detailed within the risk assessment are implemented and followed.

6.3.28

Employer Responsibility

Employers have a duty of care to their staff to protect them in the workplace. Employees of the company should not place themselves at risk.

Any concerns regarding lone working should be raised with their line managers. Employees shall make specific appointment bookings in their outlook diary detailing address, client visiting and client's telephone number, the time of the appointment and expected return time.

Inform their line manager of all site visits. The employee is to log out using 'Whiteboard' on intranet, specify time left the office, estimated time of return, and hazard rating for visit: i.e., High, Medium or Low. Employees shall use departmental lone working system, commercial lone working system as arranged by their line manager.

Employees must ensure a Lone Working Risk Assessment is in place and that all control measures detailed within the risk assessment are implemented and followed

Employees must consult the Caution Register on the intranet prior to visiting tenants and must inform their line manager of any concerns or inappropriate behaviour.

Employees must make use of any Lone Working System as directed by their line manager.

6.3.29 Hazard and Risk Assessment

Hazard Analysis and Risk Assessments will be completed and recorded. All LW shall be and will be issued with a company telephone.

The purpose of a Hazard Analysis and Risk Assessment is to identify hazard(s) and associated risk(s) for employees working alone and to identify control measures needed to eliminate hazard(s) or reduce the risk(s). The key to maximising safety whenever LW is under consideration is the performance of a satisfactory analysis and assessment which should address the following:

- ▶ Whether one person can satisfactorily control a task by themselves.
- ▶ Whether the workplace poses a special hazard(s) and risk(s) to the LW.
- ▶ Whether the risk of violence necessitates more than one person working.
- ▶ Whether the LW has enough training/experience to do the job alone.
- ▶ Whether the person is medically fit to work alone (self-certifying medical questionnaire to be completed).
- ▶ Whether adequate procedures are in place to deal with medical emergencies.
- ▶ What arrangements are required to ensure the LW is at no more risk than employees working in larger groups.
- ▶ Anything else that may be relevant during the assessment process, given the nature of the activity and the skills and qualities of the LW.

All activities undertaken by visitors, employees and contractors working in high-risk areas, such as confined spaces, hot work, electrical works, will be subject to a Permit to Work, the conditions of which will be monitored to ensure they are being followed.

Having identified all lone working activities the company will assess the hazards posed to the individual. For example, if there is a risk of violence, attack, sustaining injury through work activities or an inability to raise the alarm. Suitable control measures will then be put in place.

6.3.30 Specific Criteria to Address During Analysis and Assessment

The nature of LW is that the individual will not see their immediate manager or supervisor for varying lengths of time. Because of this, special attention needs to be paid to how these operatives' function on site and that they will have special needs. Specific hazards such as such as manual handling, hazardous substances, violence, bullying/harassment, stress and driving for long periods must be assessed. This may be through personal one to one meetings.

6.3.31 Medical Fitness

All candidates for positions involving lone working, will be required to complete a detailed medical questionnaire at recruitment and, if appropriate, to undergo a medical examination. Some pre-existing medical conditions may make them unsuitable for lone working. Each individual's suitability on medical grounds will be related to the specific job applied for and the particular hazards and risks associated with that job.

Requests for medical reports and medical records will be subject to Access to Medical Reports Act 1988 and to the Access to Health Records Act 1999 where appropriate.

6.3.32 Safety Representation

It is important that the LW have clear line of access to advice from the General Manager. This access must be made simple and easy for the LW.

6.3.33 Communication

A means of communication will be adopted for all lone working, which may include the following:

- ▶ Departmental Lone Working System.
- ▶ A commercially managed lone working system such as those managed by guardian 24 or service 24.
- ▶ Buddy system – whereby a second person is present at all times. This person may not necessarily be by the individual's side but will be in close proximity to ensure that help may be quickly summoned in the event of emergency. The 'buddy' will not be exposed to the same hazard simultaneously and they will have sufficient knowledge on the activity being undertaken and will be properly equipped with emergency equipment and be capable of putting the emergency plan into operation.
- ▶ Personal checks by another person – simply checking on an individual on a regular basis. The frequency of checks will be determined by the risk involved in the activity.

- ▶ Periodic telephone contact – telephone/mobile phone contact will be made at regular intervals. Emergency contact numbers will either be displayed prominently or pre-programmed into telephones. The interval between telephone calls will be pre-determined.
- ▶ Constant or intermittent surveillance devices may be used i.e., the use of personal pagers, two-way radios and emergency sounding devices. The use of all communication equipment should be tested for suitability and range.
- ▶ Daily outlook diaries should be up to date and accurate with regards to location, start and anticipated finish times of all visits being made throughout the day.
- ▶ The Caution Register, Contact Management or Antisocial behaviour register should be checked. If the visit to be made is with a potentially violent and aggressive person or persons connected to the tenant, then contact should be made with an appointed manager to determine the preferred method of visit and appropriate controls to be included i.e., assisted with other team members or external agencies.
- ▶ Registers need to be updated / amended continuously regarding confrontation, violence and aggression, however minor. This should be done by the visiting worker.
- ▶ Situations will be avoided where there is the potential for risks associated with lone working to be exacerbated if employees are suffering from a pre-existing medical condition. Examples would include diabetes where a casualty may faint and be unable to raise alarm or during times of fasting (for religious purposes).
- ▶ Wherever possible, measures will be put in place to protect persons from risks typically associated with lone working, for example protection from physical attack via locked doors, access control, CCTV etc.

6.3.34 Training

Sufficient training and information must be provided to the LW to enable them to identify any hazard(s) and risk(s) and take appropriate action to avoid them. They must be entitled to leave the workplace if there is serious and imminent danger. To do this they must be given every opportunity and means to enable them to recognise the dangers when they arise.

All new appointees to LW positions will receive comprehensive induction training and all employees must satisfy their supervisor that they are competent in all aspects included in the training. Subjects covered will include but not be limited to the following:

- ▶ The duties of the particular posts.
- ▶ Safety aspects of all machinery/equipment to be used.
- ▶ Emergency procedures: fire, accident, illness, physical attack.

- ▶ Organisational systems of monitoring, supervision, employees support.
- ▶ Refresher training and training in new working methods will also be provided.
- ▶ All LW and must know what actions to take in an emergency situation, and how to summon help.

6.4

6. Legislative Review

The company maintains up to date information on health and safety legislation through the review of the following documents, websites, subscriptions and publications.

- Sector specific publications
- HSE Website
- Safety journals and magazines
- Attendance to H&S seminars and conferences
- ISOH Branch meetings
- Industry Literature

6.4.1 Review

These publications and websites are subject to automatic updates and monthly newsletters. In addition, various magazines and publications are also received by the Company, together with industry specific bulletins. These publications shall be reviewed to identify any of the following that may be applicable to the company's operations:

- Changes or amendments to existing legislation
- New legislation Pending legislation
- Industry best practice

6.4.2

6.4.3 Review Method

Bi-annually and when appropriate, a legislative review shall be drafted and distributed accordingly to members of The Executive Team. Where no changes are identified this shall be communicated.

Changes in legislation will be communicated via revision and reissue of applicable H&S procedures.

Further clarification and explanation of these changes shall also be achieved via Board of Directors and Departmental meetings, company training sessions, newsletters, and staff consultative committee.

Where appropriate, a review of the documented Health and Safety Management System will be conducted. Procedures and instructions will then be modified accordingly.

6.4.4 Monitoring

Various monitoring regimes shall be used to monitor Property with applicable legislation. These monitoring regimes shall include the following as appropriate:

- H&S Audits
- Audit & Property Inspections

- Managers Safety Inspections
- Directors Safety Inspections
- Voice Group Safety inspections.
- Significant changes, incidents, accidents etc.

7. Health and Safety Planning

The responsibility for planning, measuring, and reviewing of organisational and individual health and safety performance is that of the company National Health and Safety Manager.

This will be achieved by:

- ▶ Providing and maintaining specialist health and safety advice.
- ▶ Ensuring that the organisation is kept up to date with changes in HSE, legislation, standards, and good practice.
- ▶ Ensuring that all employees are involved and participate in health, safety, and environmental issues.

6.4.5 Periodic Review

The Health and Safety Procedures will be reviewed annually, following significant change in the organisation, or following new legislation or the changes to existing legislation.

6.4.6 Audit and Review

The Company's Health and Safety Management System will be audited and will examine:

- The Company's Health and Safety Policy
- The Company's Health and Safety Procedures
- Health and Safety Organisation

6.4.7 Company Health and Safety Plan

A Health and Safety Plan will be produced on an annual basis, based on the objectives of the H&S Management System.

The expected outcome of the planning process will be:

- Identification of the strategy to be followed to improve Health and Safety performance.
- Review of documentation and procedures.
- Prioritise the H&S objectives
- Ensure resources are available to meet the objectives
- Allocate responsibilities for implementation
- Set implementation deadlines

Authorisation of the Company's Health and Safety Plan will be by the MD and The Executive Team.

6.4.8 Implementation

Offices and Schemes

To implement the requirements of the Company's Health and safety Plan at operational level in the workplace, detailed plans will be produced for each of the Company's Sites

and Offices.

The responsibility for producing Safety Plans (produced in accordance with the Health and Safety Plan Template) will be that of the Managers of the Company's sites and offices, this will be carried out in conjunction with their line manager.

6.4.9 Health and Safety Plan Contents

The following list contains the major details which should be included in site safety plans

- ▶ Introduction
- ▶ Description of Site or Project
- ▶ Management Structure
- ▶ Health and Safety Monitoring Arrangements
- ▶ Co-ordination, Communication and Training
- ▶ Arrangements for Controlling site Safety and Health Risks
- ▶ Risk assessments
- ▶ Health and Safety File
- ▶ Emergency Procedures

6.4.10 Training

Training identified by the appropriate H&S plan or as part of individuals PAP and will be given to all applicable employees.

6.4.11 Information

The location of Site Health and Safety Plans shall be given to all at induction.

8. Hazard Analysis & Risk Assessment

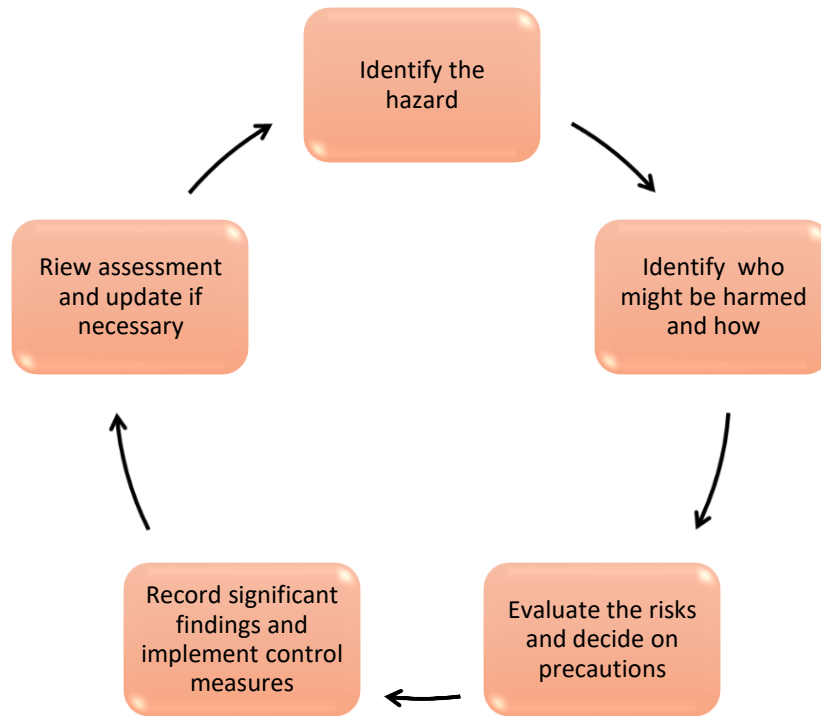
6.4.12 Implementation

Homes for Students is committed to complying with the requirements under The Management of Health and Safety at Work Regulations 1999 with regard identifying hazards, evaluating risk and then either eliminating or controlling that risk to an acceptable level.

It is Homes for Students policy to have in place a written assessment in the form of a risk assessment which is a formalised process of identifying hazards, evaluating the risk and then either eliminating or controlling that risk to an acceptable level. To this end risk assessments will be undertaken by the Health and Safety Team and reviewed on an annual basis, however it will be the responsibility of the General Manager to undertake any risk assessment that falls outside of the specific work practices.

The main objective of a risk assessment is the prevention of accidents and ill health so far as is reasonably practicable, there are 5 steps to assess risk and they are identified below and within the diagram below as:

1. Identify the risk
2. Identify who might be harmed and how
3. Evaluate the risks and decide on precautions
4. Record significant findings and implement control measures
5. Review assessment and update if necessary



6.4.13 Completion

Only competent persons who have the knowledge, training and experience must complete Risk Assessments.

6.4.14 Risk Assessment and Recording

Hazard Analyses and Risk Assessments will be completed and recorded on the Company Risk Assessment Record and Risk Matrix Form. This will detail the significant findings of the hazards and risk to individuals, the control measures needed and identify any employees, individual or other groups especially at risk. Three different company team members, as recommended by the HSE, shall be involved with the analysis and assessment; an Assessor, an Employee or Supervisor (who is knowledgeable about the work, equipment, or task), and a responsible manager (i.e., General Manager or Project Manager).

6.4.15 Record Keeping

General Manager must keep up to date copies of site-specific risk assessments in the site safety file, these must be available for staff to access.

All staff must read the risk assessment relating to the task they carry out and sign the declaration sheet to confirm that they have read and understood the corresponding risk assessments, COSHH assessments and data sheet(s) and undertake to follow all guidelines, controls outlined in the risk assessment. A copy of this record must be retained in the site risk assessment folder and updated annually

6.4.16 Completion of the Risk Assessment Forms

Completion of the Risk Assessment Form is as follows: -

6.4.17 Work Location

Describes the site, location, or premises on which the Hazard Analysis and Risk Assessment is to be carried out.

6.4.18 Work Activity

Describes the operation of the task, machine, or carrying out a task for which a Hazard Analysis and Risk Assessment is to be carried out.

6.4.19

6.4.20 Risk Assessment Control Number

A unique reference number shall be allocated to allow individual identification for each of the Company's Business Units.

6.4.21 Risk Assessment Status

All risk assessments must be specific to the task they are assessing. Although there are many common elements to tasks and activities, every task is unique because of several factors such as location, individual and environment. A Generic Hazard Analysis and Risk Assessment may be written for carrying out tasks both inside or outside of a building and for task that are carried out in multiple locations but must be reviewed to ensure they are task and site specific.

Note: Specific = Applicable to a task, operation, workplace, and individual carrying out the task.

6.4.22 Risk Matrix

On the Risk Matrix Guide mark, a cross against the applicable hazard associated.

After establishing the initial severity and then the likelihood the residual risk needs to be determined. The Risk Matrix Guide details the definitions for the level chosen.

6.4.23 Severity

The choice of severity must be balanced against the probable outcome i.e., if the task is at ground level and the hazard is slipping or tripping the outcome may be deemed as a bruised knee.

However, if the task is at high level and the associated risk is falling then the outcome may need to be more severe i.e., a fatality.

6.4.24 Likelihood

The initial choice of level of likelihood is dependent upon the knowledge, experience, and competence of the OPERATIVES who will be using the machine or involved in the task, NOT THE ASSESSOR. For example, is the use of a machine or the difficulty of the task going to produce an incident that is highly likely to occur?

It is very important that the analysis and assessment takes into consideration those who may be affected by the work. There is provision on each sheet to ensure that this is recorded.

The hazard must be identified to establish what the risk(s) are likely to be, reference should be made to relevant sources of information which might include:

- ▶ Legislation, Approved Codes of Practice, and any other health and safety guidance
- ▶ Relevant Standards or Industry Guidelines
- ▶ Product, machine, or Industry Guidelines
- ▶ Knowledge and experience of all employees
- ▶ Accident, incident, and ill health statistics

- ▶ Choice of PPE or particular equipment and plant

In complex hazard identification cases, special techniques may be applied, and expert advice and opinions considered.

Techniques will include:

- ▶ Hazard and Operability Studies (HazOp)
- ▶ Safety Critical Items
- ▶ Risk Ranking Matrices

6.4.25 Risk Quantification and Severity Ranking

Hazard A Hazard is the potential of a substance, activity, or process to cause harm.
Risk Is the likelihood of a substance, activity, or process to cause harm. Risk is linked to the severity of its consequences.

Risk is the quantum of Likelihood x Severity

When carrying out a risk assessment, a fundamental aspect to be remembered is that only the likelihood can be reduced after deciding on control measures, the original perceived severity cannot be changed.

The analysis and assessment form is in two parts. Part 1, the Risk Matrix, is to aid the assessor to identify the associated hazards of the task being assessed. The second part, the Analysis Record, is to write the description of the hazard's associated risks, the level of risk and control measures chosen e.g.:

- ▶ Describe the risk, e.g., Electrocution, fall from height, fire etc.

Red = High Risk:

Work not to proceed until control measures are in place to reduce the risk

Orange and Yellow = Medium Risk:

Work may proceed, however supplementary control measures must be considered to reduce risks further. Risk Control Systems to be implemented (monitoring and review processes to apply)

Green = Low Risk:

Work may proceed, normal Risk Control Systems to be implemented

When making such judgements consideration should also include the 'potential' severity, the likelihood of the occurrence and the number of persons exposed to the risk. Consideration of the health risk to individuals and others must be taken into account and the legal requirements.

6.4.26 Risk Control Hierarchy of Control:

Control Measure:

This is defined as the application of the hierarchy of risk control principles to reduce risk to a reasonably practicable level by:

- 6.4.27** Elimination:
Removing the hazard ensures there is no risk.
- 6.4.28 Replace/Substitute/Avoid:
Use of less hazardous process, material, equipment, barriers, guards, or method of working.
- 6.4.29** Isolate:
Use of engineering controls, safe systems of work, positive isolation, or separating individuals from the hazardous process, material, or equipment.
- 6.4.30 Control Measures/Workplace Precautions:
Use of suitable systems of work, competent personnel, and use of personal protective equipment (as a last resort).

Where the control measures involve considerable expenditure there should be a separate cost benefit analysis to justify the cost together with an assessment of alternative options, their costs, and effectiveness.

Against each significant risk, record the control measures to reduce the risk to a reasonably practicable level. When doing this take into account any relevant legal requirements.

- 6.4.31 Scope of The Assessment
Risk Assessments will be specifically applied to:

All workplace operations:

- ▶ All premises
- ▶ All machinery, work equipment and energy sources
- ▶ All materials and substances
- ▶ Sub-contractors work procedures
- ▶ Legislation and its effects on the Company, property design and installation
- ▶ Environmental emissions and waste disposal
- ▶ Levels of supervision determined by level of risk
- ▶ Employees working alone or flexible or shift hours
- ▶ Employees in safety critical posts
- ▶ Employees allocated to new work
- ▶ Other workers Visitors Public

Where identified by Hazard Analysis and Risk Assessment, The Company's standards and procedures may need to be produced or amended to control significant risks.

- 6.4.32 Young Persons
A detailed specific Risk Assessment shall be produced for any employee under the age of 18.

The assessment shall take account of the inexperience and lack of awareness of risks existing or potential. The extent of safety training provided or to be provided including fire risks, the psychological or physical immaturity of the young person.

A site-specific Risk Assessment shall take into account the fitting out and layout of the workplace and the particular site where they work.

- ▶ The nature of any physical, biological, and chemical agents they will be exposed to for how long and what extent.

- ▶ What types of work equipment will be used and how this will be handled.
- ▶ How the work and processes involved are organised.
- ▶ Risks from specific agents, processes and work.
- ▶ This Young Person's Risk Assessment shall be given at induction training and records kept.
- ▶ Appropriate control measures shall be documented and implemented including if the young person should be prohibited from any work activities, except in specific circumstances.

6.4.33 Pregnant workers and new mothers

Homes for Students have certain obligations towards their employees once they have been notified in writing that they are a new or expectant mother. The employee will provide written notification (regulation 18 of MHSW) to Homes for Students stating that they are pregnant, or that they have given birth within the past six months or that they are breastfeeding.

A such Homes for Students will immediately take undertake a risk assessment to identify any hazards, which may present a risk during pregnancy and implement control measures and/or take action to ensure that the employee is not exposed to anything, which would damage either their health or that of their developing child.

General hazards may include but not limited to:

- Physical shocks - including direct blows to the abdomen
- Vibration - of whole body, there are guidelines on vibration
- Handling a load - there are guidelines on handling of loads
- Noise – there are guidelines on noise
- Excessive heat or cold
- Movement and postures which are abrupt or severe or give rise to excessive fatigue
- Ionising radiation
- Non-ionising radiation
- Biological agents – including viruses, bacteria etc.
- Chemicals – including substances, which cause cancer, mercury, anti-cancer drugs and carbon monoxide.
- Stress and/or bullying

If after carrying out a risk assessment, a risk is revealed and/or identified to the pregnant employee, the unborn or breastfeeding child, and it is not practical to ensure the safety or health of the employee through protective or preventive measures, Homes for Students will take the following actions:

Action 1 - Temporarily adjust their working conditions and/or hours of work; or if that is not possible Action 2 - Offer them suitable alternative work (at the same rate of pay) if available, or if that is not feasible.

Action 3 - Suspend her from work on paid leave for as long as necessary, to protect their health and safety, and that of their child.

6.4.34 New Contract Mobilisation

6.4.35

On mobilisation of a new contract, a Health & Safety mobilisation check list will be completed to ensure all hazards and risk have been identified and appropriate control measures implemented. This is to include all statutory documentation and the service records of life safe systems contained within the property.

The Fire Risk Assessment will be reviewed by the compliance team, in particular by the National Health and Safety Manger to address and review any significant hazards identified within the risk assessments.

The CS Team or General Manager will identify the environmental aspects relating to the contract and ensure that all hazards and risk have been identified and appropriate control measures implemented, and an Aspects Register is completed which is site specific.

6.4.36

Method Statement/Safe System of Work

A Method Statement must be produced by an employer for an employee which describes in a logical sequence exactly how a job is to be carried out in a safe manner and without risk to health. It includes all the risks identified in the risk assessment and the measures needed to control those risks.

The law, requires employers to provide systems of work that are planned, organised, performed, maintained, and revised as appropriate so as to be, so far as is reasonably practicable, safe and without risk to health. A system of work is a set of procedures according to which work must be carried out. Safe systems of work are required where hazards cannot be eliminated, and some risk still exists. Systems of work must be communicated and understood by the relevant employees. The detail of the system of work, for example, whether it is oral or written will depend on the level of risk and the complexity of the work involved. For example, high risk activities where there is a risk of serious injury or death, will need to have documented systems of work which are strictly supervised and enforced.

A Method Statement is a safety critical document and as such is controlled by the document issuer.

It is vital that all those involved in the task receive a briefing about the Method Statement, hazards and risks. The briefing should be read to those involved as well as a copy given to them to read. The briefing should ensure that all those involved are aware of the remaining hazards and risks after taking into account the control measures adopted in such a case a safe system of work will be introduced.

The person giving the brief must establish that all those attending understand English by asking those present, if not the situation must be addressed.

6.4.37

Review Process

Legislation requires that a review process be put into place for the method of work chosen for any given task. To do this effectively this must also include the Hazard Analysis and Risk Assessment, making sure that all elements of the task have been re-assessed.

The Risk Assessment must be reviewed periodically where there are material changes which may involve the following reasons:

- ▶ When it is deemed that the Risk Assessment is no longer valid
- ▶ When the Risk Assessment is affected by significant change of circumstances
- ▶ Following corrective/preventative action arising from accident/ incident investigation, audit, or inspection etc

- ▶ When the task has been carried out for the same way for a long period of time
- ▶ Where the site has changed significantly, and environmental conditions have changed

It is company policy and practice that Risk Assessments will be reviewed annually, following significant change in the organisation or following new legislation or change to existing legislation

9. Preparation & Management of Method Statements

6.4.38 Details of Procedure

Site Address: Full Address of site where the work is to be completed. Date of work: Date the work will occur

Activity: Actual work being undertaken Hazards: hazards that will be encountered

Method of control: How these will be managed.

Work stages: Step wise details of how the work will be undertaken. Site contacts:

Contact details for the Client

Health & Safety Contract: Homes for Student's General Manager & contact details HFSs Manager: Manager in charge & contact details

Monitoring: How the work will be monitored

Review: A brief review of the Method Statement after completion of the work to assess suitability

Signed; Names, signatures and date the completed to document agreement by HFS & the Client

All Method Statements MUST be produced, and signed agreements attained BEFORE the work is undertaken. A copy of the completed form should be kept at the site of the work.

All completed forms will be kept for 3 years at the relevant Contract Office and made available for audit as and when requested.

It may be necessary to submit method statements several times before it is signed off.

The method statement must be concise but cover all the necessary points. As such, the average length of the document will vary dependent on the work undertaken.

10. Control of Electricity

6.4.39 Electrical systems

Are those that provide electrical power to the building and its associated electrical equipment, it can in some circumstances include secondary power supplies e.g., generators, wind turbines.

6.4.40 Work activities associated with electrical systems

In the case of work of an electrical nature it is required that the conductors be made dead before remedial work starts. In such cases it is essential that the equipment be isolated which will include securing by locking off etc; and the conductors proven dead at the point of work before the work starts. Where a test instrument or voltage indicator is used for this purpose, this device should itself be proven, immediately before and immediately after testing the conductors.

6.4.41 Safe System of Works

Safe systems of work incorporating safety isolation procedures are important for work upon equipment which is to be made dead before work starts. Some work, such as fault finding and testing, may require electrical equipment to remain energised during the work. In these cases, if there may be danger from live conductors, relevant protective equipment may need to be provided. The 'protective equipment' can be of wide application but typically includes those special tools, protective clothing and insulating screening materials etc. necessary to undertake work safely on live electrical equipment.

The operation, maintenance and testing of electrical systems and equipment should be carried out only by those people who are competent for the particular class of work.

6.4.42 Hard wired electrical equipment

This is any piece of electrical equipment which is wired directly into the electrical system and not connected via a flex cable.

6.4.43 Portable electrical appliances

Portable appliances are not part of a fixed installation but when used are connected to a fixed installation (or secondary supply), by means of a flexible cable, plug and socket. It includes equipment that is handheld or hand operated while connected to the supply.

It also includes extension leads, plugs, and sockets, and cord sets that supply portable equipment and are not part of the fixed installation, since they operate in the same environment and are subject to similar use as the equipment they serve.

It is Homes for Students Policy that PAT testing will take within all offices under their management, this includes central services and at property level in addition all PAT testing will be undertaken by a competent person who has had suitable and sufficient training and can prove their competence.

6.4.44 Live Working

Live working is not permitted under any circumstances, Live testing, is only permissible under the supervision of competent persons and in line with the relevant risk assessments and method statements.

Live testing is only permissible under the supervision of competent persons and in line with the relevant risk assessments.

6.4.45 Electrical Isolation

All electrical work will be undertaken by a competent person, this may include but not limited to electricians, electrical engineers and or maintenance operative who have had suitable and sufficient training and can prove their competence.

Prior to any work being undertaken on the electrical system it must first be isolated from the supply and proven dead, the following procedure should be followed:

Testing to establish whether electrical conductors are live, or dead should always be done on the assumption that they may be live until such time as the conductors have been proven dead.

- ▶ Apply warning signs to working areas.
- ▶ Identify the faulty equipment and/or the electrical fault.
- ▶ Identify the circuit which supplies the appropriate equipment and/or conductors.

- ▶ Inform all persons who may be affected by the isolation, what work is required and an estimated time of how long the electrical services will be isolated for.
- ▶ Prove the electrical test meter on a known live circuit.
- ▶ Test the electrical circuit before making any alterations, this is to determine that the existing circuit is in a satisfactory condition and meets current regulations.

NEVER ASSUME THAT THE CIRCUIT IS SATISFACTORY, ALWAYS WORK ON THE SIDE OF CAUTION.

- ▶ Isolate the circuit protective device and lock off in accordance with section 12, Lock Out – Tag Procedure.
- ▶ Retest the conductors to prove they are dead.
- ▶ Carry out the required work in a safe manner.
- ▶ Carry out the relevant tests before reapplying power.
- ▶ Remove locking device and repower the circuit.
- ▶ Carry out the relevant tests once power is restored
- ▶ Complete final checks ensuring all distribution board covers are replaced and locked.
- ▶ Complete the relevant certificate, this will be determined by the scope of works completed.

6.4.46 NO LIVE working is permitted.

It should never be assumed that equipment is dead because a particular isolation device has been placed in the OFF position.

If you have any doubt, seek further advice from the Engineering Manager

6.4.47 Purchasing Of Electrical Equipment

All electrical equipment which is purchased must meet current British and European Standards, the requirements of the Provision and Use of Work Equipment Regulations 1998 and also be suitable for the purposes that they are to be used for.

6.4.48 Maintenance of Electrical Systems and Equipment

Repair and maintenance of electrical systems and equipment can only be carried out by staff that are suitably qualified and competent or company approved contractors.

A full inventory must be made of all electrical systems, fixed equipment and portable appliances in every location across the company. Each system and item of fixed or portable electrical equipment must then be provided with a unique Asset /Identity number.

The frequency of inspection and testing for equipment and systems is to be carried out by competent persons are,

- ▶ Electrical Installation Condition Reports (EICR), every five years;
- ▶ Portable Electrical Appliances Routine Inspection: annually

Where electrical systems, appliances and equipment are found to be unsafe, it must either be made safe or withdrawn from service. Records must be kept of inspections and tests for 5 years.

All privately owned electrical equipment which is brought into the company premises will be subject to the same statutory electrical inspection and testing as the company owned equipment.

Note: Every person has a responsibility to ensure that all defective equipment or systems are reported to their line manager who should ensure that it is repaired, where systems or items are unsafe, they must be taken out of action. Asset lists are to be regularly updated to show details of faulty equipment.

6.4.49 Portable Electrical Appliances Routine Inspection

All portable electrical equipment used by the company whether it be at their offices, workshops or on any of their sites, must be inspected at regular intervals to ensure that such apparatus is deemed safe to use. Any equipment deemed not safe shall not be used until the relevant faults are rectified and certificated.

6.4.50 Appliance Identification

Individual items of portable equipment will be identified by an asset number and a register of such equipment maintained at the office, workshop, or site where it is in use.

6.4.51 Inspection Frequency

The frequency at which portable electrical equipment is inspected will be dependent upon:

6.4.52 The type of equipment

Frequency of use of the equipment

The environment in which the equipment is used

Portable electrical equipment in use in workshops and on sites will need to be inspected on a more frequent basis than office-based equipment. The frequency of inspection of apparatus will be noted in the Safety Plan for the office, workshop, or site location.

6.4.53 Record of Inspection

The inspection of portable electrical equipment will be carried out by a suitable Competent Person. The inspection will record:

- ▶ The equipment identification
- ▶ A unique asset number
- ▶ Date of inspection
- ▶ A record of test results.
- ▶ A record of any defects revealed during testing.
- ▶ Equipment found unserviceable during inspection will be withdrawn from use until the defect has been rectified.

6.4.54 Fixed Electrical Installations Inspection

Legislation requires that all electrical installations are maintained in a safe condition and therefore must be periodically inspected and tested, the company therefore indorses that all their sites whether it is at their offices, workshops or on any of their sites will be inspected and tested at intervals in accordance with the IEE Wiring Regulations (BS 7671).

On completion of the inspection a Periodic Inspection and Testing Certificate will be issued highlighting any deviations or dangers which may arise. Any code 1 or code 2 defects will be brought to the client's attention as they will need rectifying, code 3 and code

The periodic certificate and copies will be held by

- The site office (if applicable)
- The company's main CAFM system
- The company's Amtech database.

11. Control of Substances Hazardous to Health

The COSHH regulations require employers to take actions to prevent or significantly reduce their workers' exposure to any substances that would be hazardous to their health. This would include any dangerous substance that could affect a worker in the short term, for example if a cleaner splashed bleach on their hands or eyes. It would refer to any substances that could cause long term ill-health, such as asthma from workplace fumes and dust.

In addition, it also applies to possible situation or practices that exposes the worker to substances that could cause severe health issues in later life, such as possible carcinogens

Hazardous substances may take many different forms, including solids, dust, liquids, mists and gaseous fumes, and include certain chemicals, dusts, bacteria and other micro-organisms, as well as any other substance which has comparable health effects. The exposure to hazardous substances can be by skin contact, inhalation and ingestion which can adversely affect the body in many different ways.

As such the COSHH regulations specify the eight measures that employers must follow to prevent and/or limit their employees to the exposure of hazardous substances.

To this end Homes for Students will adopt these measures to limit and/or remove exposure to hazardous substances, as such the measures adopted are as follows:

- i. Assess the risk to employees
- ii. Decide what precautions are required
- iii. Will prevent and/or adequately control exposure to employees
- iv. Ensure that control measures are implemented, used and maintained
- v. Monitor exposure where required through carrying out appropriate health surveillance
- vi. Have plans, policies and procedures in place to deal with any accident, incident and/or near miss.
- vii. Employees will be properly informed, trained and supervised.

6.4.55 Duties of General Manager

The General Manager is responsible for information gathering. The General Manager must prepare an inventory of all substances and materials used by the workforce which are covered by the regulations. This form shall be held in the site COSHH folder.

The inventory should identify where on the site the substances are present and the likely people to be exposed. The inventory of substances will be listed in the site health and safety file.

The COSHH coordinator is responsible for completing a site COSHH assessment for all substances used.

Unused or out of date substances should be disposed of in an environmentally friendly way of in line with recommendations in the manufacture's material data sheet.

6.4.56 COSHH Assessment

The Health and Safety team will be responsible in ensuring that suitable as sufficient risk assessments are in place for all hazardous substances used and/or stored within properties under Homes for Students management, to this end the selection of substances and the implementation of the most appropriate control methods of risk or hazard controls will be considered, utilising the hierarchy of control.

To ensure that suitable and sufficient COSHH risk assessments are in place, the manufacturers Safety data sheets will be used whilst undertaking the risk assessment process, as this will provide specific information on chemical products, the hazards associated with that chemical and give information on handling, storage, and the emergency measures/actions to be taken in the event of accidents and/or fires.

It must be noted that the A safety data sheet is not a risk assessment and will only be used for the information it contains to assist in the risk assessment process.

On completion of the COSHH risk assessments it will be expected that all COSHH risk assessments and safety data sheets will be held on the properties and within the COSHH stores, in addition all COSHH will be held within an inventory for that particular property.

6.4.57 Provision of Assessments to Employees

On completion of the COSHH risk assessments it will be the responsibility of the General Managers to cascade the risk assessments to all team members and to ensure that they are readily available.

All staff to read the COSHH risk assessments and shall confirm that they have read and understood the COSHH risk assessments and corresponding data sheet(s) for substances. Should an employee not be able to read the documents, alternative means will be explored to ensure that they are aware of and have a good understanding of the documents.

To ensure compliance Regional Operations Director, Client Portfolio Director, Senior Portfolio Manager, Portfolio Managers and Operations Managers and the Health and Safety team will conduct audits to ensure that the process are being followed. In addition to this Lighthouse Risk Services LLP, undertake annual Health and Safety audits and the Control of Substances Hazardous to Health will be assessed during the audit

6.4.58 Record Keeping

General Manager must keep up to date records in the site safety file, records must include the following:

A copy of all COSHH Assessments Manufacturers Material Safety Data Sheets
Local Exhaust Ventilation Maintenance Records (where applicable). Respiratory Protective Equipment Maintenance Records (where applicable).

Health Surveillance Records (Non-Medical) (where applicable). COSHH Declaration sheet

6.4.59 Review of Inventory and Assessments

The Health and Safety team will review all COSHH risk assessments on an annual basis, this is to ensure that the risk assessments remain suitable, sufficient and that the control measures

implemented are still effective. However, the COSHH risk assessments may trigger a review in the following instances:

- Significant changes to the work process or design
- There is a change or addition to machinery, tools or equipment
- New information becomes available about a product
- The introduction of new substances or chemicals
- if an accident, incident and/or near miss happens in the workplace that involves a hazardous chemical.

Homes for students has a strong commitment to our environment and the impact that we as a company have on the environment, to this ends we will ensure so far is reasonably practicable that all chemicals are disposed of in a safe and ethical manner as to limit our impact on environment.

6.4.60 Medical Surveillance

The COSHH Regulations require mandatory medical surveillance where an employee is engaged in a process listed in schedule 5 of the regulations, the COSHH coordinator must contact the company H&S manager for advice

6.5

12. Manual Handling Operations

6.5.1 Risk Assessment

An initial appraisal of all manual handling tasks will be included in the overall Risk Assessment for the work operation and manual handling risks categorised.

Where the Risk Assessment categorises a task as a medium or high risk, then the following control hierarchy must be followed:

- i. Avoid manual handling where possible
- ii. Use mechanical means to lift, push or pull.
- iii. Assess the risk of injury from any hazardous manual handling operations that cannot be avoided.
- iv. Reduce the risk of injury from Hazardous manual handling operations, so far as reasonably practicable.
- v. If hazardous manual handling cannot be avoided, carry out a specific manual handling assessment and record it.

6.5.2 Avoidance of Manual Handling

Following the initial appraisal, the elimination of the manual handling activity should be considered first. Can work be done without moving them? If this is not practicable then some type of mechanical device will reduce the manual handling risk but could introduce other different risks.

6.5.3 Assessment Criteria

Where a specific manual handling assessment is carried out you must take into account the

following:

- i) Assess the task before individuals are put at risk.
- ii) Take into account the loads weight/size/shape etc.
- iii) Take into account the individuals' physical capabilities.
- iv) Take into account the environment, i.e., floors, stairs, outdoors etc.

6.5.4 Assessment Review

A review of manual handling risk assessments and associated control measures will take place following:

- i) The introduction of new equipment material or new work processes
- ii) The introduction of any new control measure, i.e., mechanical handling device.
- iii) Work operation changes which make the assessment invalid.
- iv) Injuries, accidents, near miss incidents or discomfort are reported.
- v) On the appointment of new staff or, the allocation of new roles or responsibilities to members of staff.
- vi) Specific manual handling risk assessment will be undertaken for vulnerable staff, young people and employees with a disability or medical condition.
- vii) On notification of new expectant or nursing mothers.
- viii) If there is any reason to suspect that the current risk assessments are no longer valid.
- ix) On an annual basis.

13. Display Screen Equipment

6.5.5 Workstation Risk Assessments

Managers must appoint a person to carry out Risk Assessments (Site CS Officer) for those DSE workstations that are used by a person.

The assessment must be carried out and recorded on the DSE Workstation Assessment form.

6.5.6 Remedial Action

Following the Risk Assessment, the Manager must ensure that DSE workstations are upgraded/alterd if required to comply with either the assessor's recommendations or the minimum requirements for workstations which are detailed on the DSE Workstation Assessment Checklist.

For more complex needs the company's Health & Safety Consultants will offer advice and support.

6.5.7 Daily Work Routine

Whenever possible jobs that involve work at display screens should be designed to consist of a mix of screen based and non-screen-based work. Where this is not possible, i.e., data input, and then deliberate breaks in routine must planning as part of the work routine.

6.5.8 Eye and Eyesight Tests

An eyesight test must be available under the Health and Safety (Display Screen Equipment) Regulations to DSE Users who make a request. Where an employee makes such a request authorisation for the test must be given by the Supervisor/Manager by completion of the VDU Eye Test Authorisation Form. Once the authorisation form has been completed, the employee can then book an eye test and claim the payment for the test on their expenses.

14. Personal Protective Equipment (PPE)

6.5.9 Assessments

PPE should always be regarded as the 'last resort' to protect persons against risks to health and safety. Engineering controls and safe systems of work should always be considered first.

The need for PPE will be identified by the Risk Assessment process required by Risk Assessment Procedure.

Before purchase of any PPE an assessment of its suitability must be made e.g.,

Hearing protection

Is it suitable?

Does it provide adequate protection?

Eye protection - Full face screen or safety glasses required?

6.5.10 Provision of PPE

Where the risk to an employee's health and safety cannot be adequately controlled by other means, Managers are required to ensure that suitable PPE is provided to that employee free of charge.

PPE need not be provided if the risk caused by wearing it is greater than the risk against which it is meant to protect.

In providing PPE the following factors have to be considered:

- ▶ The PPE must be suitable to provide appropriate protection against the risks encountered and for the circumstances of its use
- ▶ The quality of the PPE
- ▶ The PPE (Safety) Regulations require all PPE to comply with design and manufacturing standards. This requires PPE to display the 'CE' mark on the product
- ▶ PPE must be kept readily available for use, or clear instructions must be given on where it can be obtained
- ▶ The provision of appropriate accommodation for the safe storage of PPE when it is not in use
- ▶ Information, instruction, and training for employees required to use the PPE.

6.5.11 Issuing Procedure

Managers will complete the PPE Register for the issuing and recording of PPE at induction or thereafter. Where PPE is protecting personnel from a chronic (long term) risk, e.g., noise, vapours etc. then records of PPE issued must be logged in the HR file and kept for forty years.

6.5.12 Use of PPE

Managers will ensure that reasonable steps are taken to monitor the proper use of PPE.

Employees are required to use PPE issued to them. Non-Property must be dealt with under the Disciplinary Procedure.

On some construction sites it is mandatory that safety helmet, safety boots and gloves are

worn as a minimum by everyone on site. Any mandatory site requirements must also be worn. The only exception to this policy is when a full Risk Assessment has been carried out and the risk of any injury is negligible. This Risk Assessment must be signed by the Director of that business before the removal of the mandatory requirement.

6.5.13 Maintenance and Replacement

Managers must ensure Maintenance Procedures for PPE are in place in the Site Safety Plan in accordance with manufacturer's recommendations so that the equipment continues to provide the degree of protection required.

The Maintenance Procedure will include, where appropriate, testing, thorough examination, inspection, repair, cleaning, and replacement. All PPE should be inspected periodically but records should be kept for the following items:

Respiratory Protection: Follow manufacturer's guidance
Harnesses:

Safety Helmets: Inspect annually, replace every 3 years.

The Maintenance Procedure will include replacement periods for issue of safety footwear and overalls.

15. Control of Asbestos

6.5.14 Responsibilities

Application of this procedure is mandatory where work is being undertaken in premises that contain or are suspected to contain Asbestos Containing Materials (ACMs), and that may possibly give rise to inadvertent exposure to asbestos fibres. Homes for Students managers in control of premises, or those responsible for managing both reactive and planned maintenance must be aware of the requirements of the Asbestos Management Procedure and associated Asbestos Management Plan and follow them accordingly.

It is mandatory that all Homes for Students Staff, contractors & consultants consult the Homes for Students Asbestos Register prior to any works, if no asbestos is in place work must not start until a survey has been completed.

6.5.15 Duty to Manage ACMs

Regulation 4 of the Control of Asbestos Regulations 2012 defines the legal duty to manage asbestos in non-domestic premises. This includes all non-domestic buildings; whatever type of business is carried out in them. It also covers the common areas of residential rented properties, including halls, stair wells, lift shafts and roof spaces, boiler rooms etc. It also includes dwelling areas where we carry out routine maintenance, and will include works where we may expose cavities, i.e., during refurbishments or alterations.

The Health and Safety at Work etc Act 1974 (HSW Act) requires an employer to conduct their work in such a way that their employees will not be exposed to health and safety risks, and to provide information to others about their workplace which might affect their health and safety. Section 3 of the HSW Act contains general duties on employers and the self-employed in respect of people other than their own employees. Section 4 contains general duties for anyone who has control, to any extent, over a workplace.

The Management of Health and Safety at Work Regulations require employers and self-employed people to make an assessment of the risks to the health and safety of themselves,

employees, and people not in their employment arising out of or in connection with the conduct of their business – and to make appropriate arrangements for protecting those people’s health and safety.

There are also duties to maintain workplace buildings/premises to protect occupants and workers under the Workplace (Health, Safety and Welfare) Regulations 1992.

The Construction (Design and Management) Regulations require the client to pass on information about the state or condition of any premises (including the presence of hazardous materials such as asbestos) to the planning supervisor before any work begins and to ensure that the health and safety file is available for inspection by any person who needs the information.

Where Homes for Students is responsible for maintaining and repairing all or part of a property or has control of a building The Company is classed as the ‘duty holder’.

Although there are no legal requirements to carry out management surveys in domestic properties, the Asbestos: The survey Guide HSG264 (Second edition, published 2012), section 64 states “Management surveys should be carried out on properties which contain or possibly contain ACMs”. There are also statutory requirement in all of the above-mentioned legislation

requiring work activities to be carried out safely to protect the health safety and welfare of others.

6.5.16 Homes for Students as Duty Holder

As the duty holder Homes for Students **must** manage any asbestos containing materials, the broad requirements of the CAW2012 on employers and others are to:

- ▶ Take reasonable steps to find materials likely to contain ACM or presumed ACMs.
- ▶ Presume materials contain asbestos, unless there is strong evidence to suppose they do not
- ▶ Assess the risk of the likelihood of anyone being exposed to asbestos from these materials
- ▶ Make a written record of the location and the condition of the ACMs and presumed ACMs and keep it up to date
- ▶ Repair or remove any material that contains or is presumed to contain asbestos, if necessary, because of the likelihood of disturbance, and its location or condition, priority will be given to priority one assessments.
- ▶ Prepare a plan to manage that risk to ensure that:
 - Information on the location and condition of ACMs is given to people who may disturb them during work activities
 - Provide information to others including customers who are liable to disturb asbestos.
 - Any material known or presumed to contain asbestos is kept in a good state of repair
- ▶ Take the necessary steps to put the plan into action
- ▶ Review and monitor the action plan and the arrangements made to put it in place

- ▶ Periodically review and monitor the plan and the arrangements to act on it so that the plan remains relevant and up to date (6 monthly);
- ▶ Provide training on asbestos awareness as appropriate.
- ▶ Monitor the condition of ACMs and presumed ACMs at regular intervals and record the findings of the inspections and update records to show the findings.

There is also a requirement on all staff, contractors, tenants, and others to co-operate as fully to

allow the duty holder to comply with the above requirements.

Homes for Students will take reasonable steps to ensure that all customers are informed of the location of ACMs within their property. Lease holders must allow us access to carry out inspections. However, the responsibility to survey and keep records will depend on individual leasehold agreements.

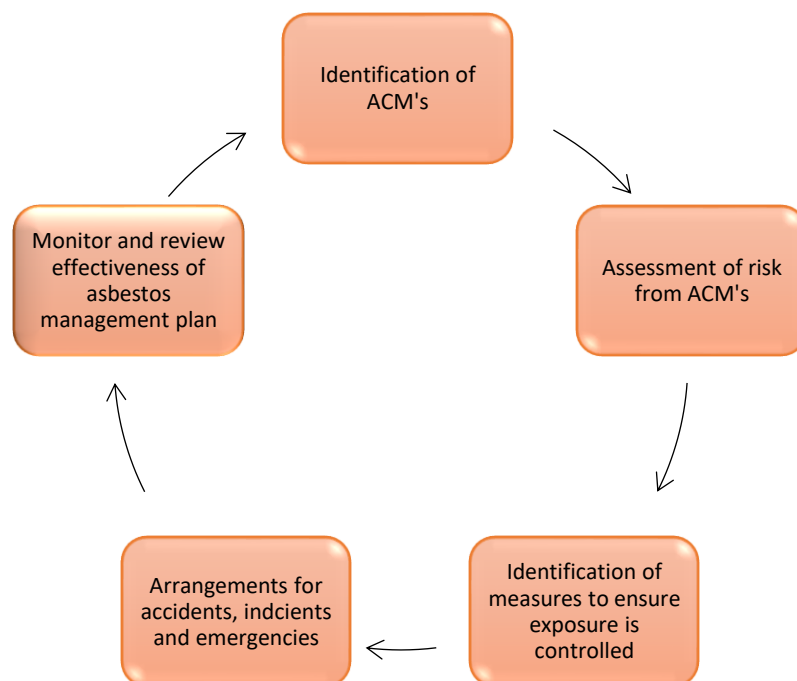
6.5.17

Overall Control

Homes for Students acknowledges and accepts its statutory responsibility under The Control of Asbestos Regulations 2012 other relevant legislation. To this end the application of this procedure is mandatory where work is being undertaken in premises that contain or are suspected to contain Asbestos Containing Materials (ACMs) which may expose persons to risks arising from the inhalation of dust from asbestos or materials containing asbestos.

Homes for Students managers in control of premises, or those responsible for managing both reactive and planned maintenance must be aware of the requirements of the Asbestos Management Procedure and associated Asbestos Management Plan and follow them accordingly. It will be mandatory that all Homes for Students Staff, contractors & consultants consult the Homes for Students Asbestos Register prior to any works being undertaken, if no asbestos register is in place, work must not start until a survey has been completed/undertaken by a competent person as described in legislation.

Homes for Students will adopt an asbestos management process to prevent the exposure to asbestos fibres insofar as is reasonability practicable, as such the asbestos management process will be as follows:



It must be noted that as long as ACMs are not damaged or disturbed and remain in good condition, the risk of exposure from release of fibres is minimal and should not present any threat to the health.

6.5.18 Inadvertent Exposure

Where employees or others have been subject to an inadvertent exposure to asbestos, or suspected ACMs within a premise controlled by Homes for Students of its contractor, a record of the details, including the subsequent investigation, must be passed to the HR and Property

Manager who will inform the employees concerned. A copy shall also be passed to the Personnel Department for recording on employee history file. This information will be kept for at least 50 years

6.5.19 Emergency Procedure

If anyone suspects that an asbestos containing material has been disturbed the following action should be taken immediately:

- ▶ Evacuate the area, without causing alarm, cordon or lock off the area until a full assessment has been completed.
- ▶ Leave all tools and equipment in the area
- ▶ Remove and double bag all potentially contaminated clothing
- ▶ Report to Asset Management Team Senior Surveyor responsible for the works
- ▶ Consult the asbestos register for that area
- ▶ The line manager in conjunction with the company Property will ensure a full assessment of the situation is carried out by a competent person and will arrange for any necessary testing/cleaning procedures as guided by the competent person.
- ▶ Record, if possible, all the names of all persons potentially affected

16. First Aid

6.5.20 First-Aiders

A sufficient number of first aiders will be appointed to satisfy each scheme first aid assessment.

6.5.21 Appointed Person (First Aid)

Where the assessment does not require the provision of first aiders, an Appointed Person must be available. The duty of an appointed person is to take charge in an emergency and call the necessary emergency services.

6.5.22 First-Aid Boxes

First-aid boxes will be provided to satisfy the assessment findings and suitable arrangements made for the boxes to be inspected for content and refurbishment.

It is the responsibility of the appointed first aiders to ensure that the contents of the first aid box are kept replenished and that all items are within use by date.

The boxes must be clearly identified as first-aid containers with a white cross on a green background. The contents of the box should be in accordance with the Approved Code of Practice.

First-Aid Facilities Provided by Others

In some instances, first aid provision may be provided for us by other persons, e.g. The Principal Contractor or the Client. This agreement must be confirmed in writing and detailed in the location Safety Plan.

6.5.23

17. Work Equipment

Assessments of work equipment will be completed and recorded on Work Equipment Assessment Record. The Work Equipment Assessment Record must consider the following:

- ▶ The suitability of the work equipment for its intended purpose and the location in which it will be used.
 - ▶ The equipment must comply with the Supply of Machinery (Safety) Regulations and the Provision and Use of Work Equipment Regulations, e.g., CE marked.
 - ▶ If a pressure system (as defined in the PSSR) is in use, that it complies with the Pressure Systems Safety Regulations 2000.
 - ▶ The competence levels required for potential users, training standards and provision of information.
 - ▶ The maintenance requirements to keep the equipment in efficient working order and repair.
 - ▶ The periodic inspections to maintain safe conditions.
 - ▶ The work equipment stability.
 - ▶ The luminance levels required for safe operation.
 - ▶ The need to fit warning signs or identify controls.
 - ▶ The need for isolation from the source of energy for maintenance or emergency.
-
- ▶ The need to protect drivers of mobile equipment from falls, overturning or falling objects.
 - ▶ Dangerous (moving) parts of equipment (see 5.3)

These points must be considered before the purchase or hiring of new work equipment.

Risk Assessments must also consider how employees use the work equipment and address any significant risks which arise because of the work method.

The primary objective of the Work Equipment Assessment Record is to ensure that work equipment should not result in health and safety risks, regardless of its age, condition or origin. Examples of work equipment to be assessed are as follows:

- ▶ Hand Drills
- ▶ Mobile Elevated Work Platform
- ▶ Mobile Scaffolds
- ▶ Stepladders
- ▶ Harnesses

6.5.26 Control of Dangerous Parts of Equipment

Dangerous parts of work equipment in general are moving machine parts. Effective measures to prevent access to dangerous parts or stop their movement before any part of a person

enters a danger zone must be implemented. Measures taken to prevent access must include:

6.5.27 Fixed enclosing guards.

Other guards or protection devices such as interlock guards, pressure mats or light guards. Protective appliances such as jigs, holders, push sticks etc.

6.5.28 Maintenance

General Managers must ensure that systems are in place for maintenance of work equipment. The frequency of planned preventative maintenance will be determined by:

The frequency of use.

The operating environment.

The potential risk to health and safety from malfunction or failure. Manufacturer's recommendations.

Maintenance logs must be kept for high-risk equipment such as, MEWPs, forklift trucks etc. Records shall be maintained on Site Plant, Tools and Equipment Register.

6.5.29 Inspection

General Managers must ensure that systems are in place for inspection of work equipment. The frequency of inspections is determined by Regulations or company requirements.

Details of maintenance and inspection systems must be included in the site H&S file and records kept for audit purposes.

Any work equipment found to be faulty shall be quarantined, labelled and either repaired or disposed of.

6.5.30 Portable Power Tools

Power tools can be either electrical, air or petrol driven, and each energy source presents different hazards. Consideration should be given to the environment in which the equipment has to be used such as flammable atmosphere, confined space etc.

Electric powered tools are the most common and most workshops, construction sites etc. have an 110V supply which is centre tapped to earth.

Where 240V supply must be used, it must be supplied via a residual current device and the power tool double insulated, (the symbol being a square inside a square).

Petrol driven tools present a risk of fire during refuelling operations or if leaking. Funnels must be used for refuelling and inspections should look out for leaks.

Air powered tools present a hazard from a pressurised system and connections to the tool, source etc. must be secure. Airline connectors should be the check valve type which close once uncoupled.

All power tools present hazards from noise, vibration, ejecting particles and respirable substances. These should be controlled by limiting use, training, guards, ventilation etc. PPE should always be considered as a last resort however; stocks should always be kept.

18. Legionella

Legionella bacteria can cause severe health conditions including the potentially fatal Legionnaires' disease, people who contract Legionnaires' disease from exposure to contaminated water droplets suffer flu-like symptoms that can progress to pneumonia however those at higher risk of serious illness include people aged over 45, heavy smokers and drinkers, sufferers of chronic respiratory or kidney disease and anyone with an impaired immune system.

Legionella bacteria can be found in rivers, lakes and ponds yet pose few risks in these natural environments. However, when present in man-made water systems, the bacteria can multiply and be harmful when airborne in water droplets. Air conditioning systems, cooling towers, humidifiers, hot and cold-water systems, showers, spas, and hot tubs are common man-made environments where Legionella bacteria can grow.

Legionella bacteria is recognised as being preventable as it can be kept under control by taking suitable precautions, and in many cases the benefits of carrying out routine legionella testing far outweighs the potential health and legal risks involved from not carrying out legionella testing.

To this end, the control of the legionella policy has been implemented to provide and maintain safe and healthy working conditions, equipment and systems of work to all Homes for Students staff, students/residents, contractors and visitors within and/or who may attend the properties under Homes for Students management and will provide such resources, information, training and supervision as needed for the purpose of the control of legionella.

This document will provide a framework and outline the duties and/or activities designed to assess the sources of risk, prevent and/or control the risks from hazardous substances (including biological agents such as legionella), by implementing, managing and monitoring processes at all Homes for Students properties, as required under The Health and Safety at Work, etc Act 1974 and other subsequent legislation.

Regular testing for legionella can help prevent potential and sometimes fatal outbreaks of Legionnaires' disease as such periodic monitoring for legionella bacteria will be undertaken across all Homes for Students properties. In line with regular testing a comprehensive maintenance program that is implemented across all our properties will serve to demonstrate due diligence in safeguarding the health and well-being of staff, tenants and/or visitors across all our properties, whilst ensuring that the processes in place are working effectively and is suitable and sufficient.

In addition to the testing undertaken a comprehensive water risk assessment must be undertaken every two years. The assessment will be completed for routine system operation and use, and for circumstances such as breakdown, abnormal operation, commissioning, or other unusual circumstances.

As part of the risk assessment, the following will be included:

- Management responsibilities, including the name of the competent person and a description of your system;
- Any potential risk sources;
- Any controls currently in place to control risks;
- Any training for staff;
- Monitoring, inspection and maintenance procedures;
- Records of the monitoring results, inspection and checks carried out; and
- A review date.

19. Cold Weather

6.5.31 Weather conditions

The Company is to initiate and manage procedures for dealing with weather emergencies on all sites defined as high risk. The aim is to enable as far as reasonably practicable, the safe movement of pedestrians on the main footpaths within our schemes, including car park and bin stores on high risk and all schemes or sites with site-based staff.

The company does not have sufficient staff or financial resources to grit or clear snow on all footpaths, car parks on all or our 100 properties, therefore, a risk-based approach will be adopted for the management of cold weather conditions.

There is not an absolute duty, given the qualification of the term “so far as is reasonably practical”, and given the scale of financial and other resources involved in delivering the cold weather services and obvious difficulties in maintaining high levels of specialist equipment and staff, it is not practically possible to:

- ▶ Provide a cold weather service on all parts of The Company’s property portfolio
- ▶ Ensure all walkways are kept free of ice or snow at all times, even on routes identified as priority

Foot paths on high-risk schemes will, therefore, be gritted and or cleared of snow in descending order of priority.

6.5.32

High Risk sites are defined as:

- ▶ Sites communal areas and office receptions due to high foot fall
- ▶ Sites with steep gradients (greater than 10%), on these sites gritting bins will be provided for the use of residents.

In addition to high risk schemes all managers of schemes with site-based staff will develop and implement a site-specific cold weather plan.

Managers off high-risk schemes, and schemes with site-based staff and will be required to identify priority routes. These will be managed to reduce the likelihood of snow or ice build-up; these routes are to be communicated to all staff and residents. Due to the size of sites and limited recourse car parks will not be treated.

Where possible gates, barriers, cones, and signage will be used to indicate and control footpaths which have not been treated. The priority route plan will be displayed on the site notice board, using a site map.

Pre-salting and snow clearance of the Primary routes will be carried out based on information received from the weather forecasting service. In certain circumstances, it may be necessary to apply salt after the formation of icy patches due to unforeseen circumstances such as burst water mains for example.

6.5.33

Risk Assessment

Managers must ensure that a risk assessment is in place, which covers the hazards associated with snow and ice management on their schemes.

6.5.34

Ice and Snow Guidance for scheme managers on high-risk sites

The guidance below covers some steps which may be taken to help control the build-up of snow and ice

To reduce the risk of slips on ice, frost, or snow, you need to assess and manage the risk on your site, by following the steps below.

- ▶ Identify the outdoor areas on your scheme, used by pedestrians most likely to be affected by ice, for example: - building entrances, car parks, pedestrian walkways, shortcuts, sloped areas and areas constantly in the shade or wet.
- ▶ The monitoring of temperatures is key to prevention. Managers need to take action.
- ▶ whenever freezing temperatures are forecast. Keep up to date by visiting a weather service

site

- Met office website <http://www.metoffice.gov.uk/>
 - BBC weather website <http://news.bbc.co.uk/weather/>
- ▶ If overnight temperatures forecasted for 0 degrees or less, gritting is best carried out at approximately 16:00 hours and again at 07:00 the following morning.
 - ▶ The weather situation needs to be monitored throughout the day.
 - ▶ Consider diverting pedestrians to less slippery walkways and barrier off slippery/ untreated ones.
 - ▶ Put out warning signs. If warning cones are used, remember to remove them once the hazard has passed or they will eventually be ignored
 - ▶ Salt can stop ice forming and cause existing ice or snow to melt. It is most effective when it is ground down, but this will take far longer on pedestrian areas than on roads. Remember Salt doesn't work instantly; it needs sufficient time to dissolve into the moisture on the floor
 - ▶ If you grit when it is raining heavily the salt will be washed away, causing a problem if the rain then turns to snow.
 - ▶ Compacted snow, which turns to ice, is difficult to treat effectively with grit, and is best, cleared away prior to gritting being carried out.
 - ▶ Be aware that 'dawn frost' can occur on dry surfaces when early morning dews form and freezes on impact with the cold surface. It can be difficult to predict when or where this condition will occur. For such sudden frosts during the night, apply grit to affected areas as soon as possible.
 - ▶ Remember gritting will not completely eliminate all icy or slippery conditions
 - ▶ Record actions taken.

Please also consider slips caused by caused by wet and slippery leaves in the autumn.

6.5.35 Equipment

This would be identified and outlined as part of the risk assessment for this activity.

6.5.36 High Risk Manned Sites:

Strategically placed salt/ grit bins Snow shovel(s).

Snow-scoop, a manual push along snow plough

Grit/Salt broadcaster/ spreader. These are easy to operate and come in varying sizes, they are effective in ensuring a fast, economical, and efficient spreading of grit and salt, they also reduce the manual handling risk.

6.5.37 High Risk Unmanned Sites

Provide salt/ grit bins at strategic locations where there is a need to undertake spot salting, for use by residents.

20. Work at Height

6.5.38 Risk Assessment

Risk assessments must be undertaken on all activities involving working at height, to ensure arrangements for:

- ▶ Eliminating or minimising risks from working at height.
- ▶ Safe systems of work for organising and performing work at height.
- ▶ Using the hierarchy for selecting suitable work equipment to work at height.
- ▶ Safe systems for protecting people from the consequences of work at height.

The WAHR do not specify a minimum height requirement for work at height, any works carried

out above ground level, no matter how high are considered as working at height. They include all work activities where there is a need to control a risk of falling a distance liable to cause personal injury. This includes access to and from the place of work.

This is regardless of the:

- ▶ Work equipment being used.
- ▶ The duration the person is at height.
- ▶ The height at which the work is performed.

Work at height does not include:

- ▶ Slips and trips that occur on the level.
- ▶ Falls on permanent stairs if there is no structural or maintenance work being undertaken.
- ▶ Work in, for example, an office on the upper floors of a multi-story building where there is no risk of falling (except activities within the workplace which do involve a risk of falling, e.g., from a stepladder).

6.5.39 Requirements for Work at Height

When carrying out the Work at Height Risk Assessment the following hierarchy of measures must be followed. This will allow the most appropriate methods for work at height. The overriding principle is to prevent, so far as reasonably practicable, any person falling a distance liable to cause personal injury.

Hierarchy for Safe Work at Height:

AVOID - The risk by not working at height, where it is reasonably practicable to carry out the work safely other than at height do so.

PREVENT - Where it is not reasonably practicable to avoid work at height, you should assess the risks and take measures to allow the work to be done whilst preventing so far as reasonably practicable people or objects falling. This might include choosing the right work equipment to prevent falls.

MITIGATE the consequences of a fall – where the risk of people or objects falling still remains you should take steps to minimise the distance and consequences of such falls. This also involves the selection and use of work equipment.

At all stages give collective protective measures (e.g., guardrails, nets, airbags, etc.) precedence over personal protective measures (e.g., safety harnesses).

With the aid of the hierarchy, you should be able to:

- ▶ Assess the risk to help you decide how to work safely.
- ▶ Follow the hierarchy for safe work at height – avoid, prevent mitigate; and give collective measures priority.
- ▶ Plan and organise your work properly taking account of weather conditions and the possibility of emergencies e.g.
- ▶ Consider prevailing health conditions that may impact on working at height.
- ▶ Make sure those working at height are competent.
- ▶ Make use of appropriate work equipment.
- ▶ Manage the risks from working on or around fragile surfaces and from falling objects.

- ▶ Inspect and maintain work equipment to be used and inspect the place where the work will be carried out (including access and egress).

6.5.40 Requirements for Stepladders/Ladders

Managers must ensure that a ladder is not used for work at height unless a Risk Assessment under Regulation 3 of the Management Regulations has demonstrated that the use of more suitable work equipment is not justified because of the low risk and the short duration of use (30 minutes maximum).

When step ladders are used, they should be placed upon a stable, firm surface which is of sufficient strength to ensure that the ladder rungs remain horizontal including when any load is placed on it.

Stepladders are only to be used as a place of work when other potentially safe means such as tower scaffolds are not reasonably practicable and only for short duration work, 3 points of contact should be maintained at all times.

Stepladders can occasionally be used sideways, but not for any work or activity that puts a significant side loading on them. The following activities should not be undertaken on stepladders sideways:

- ▶ Cable pulling
- ▶ Drilling
- ▶ Sawing

Certain activities that can be done sideways may include inspection work, painting, and operating switches.

Ladders and stepladders that are used on site must be industrial built and comply with the following:

- ▶ Timber BS 1129: Kite marked Class 1 Industrial
- ▶ Aluminium BS 2037: Kite Marked Class 1 Industrial
- ▶ Glass Fibre BS EN 131: Kite marked Industrial
- ▶ Step Stools BS 7377

On no account should domestic steps or Class 3 red ladders be used on site.

6.5.41 Maintenance and Inspection of Ladders & Stepladders

Any ladders or stepladders being used by The Company or contractors working for The Company must have a unique identification number. The stepladders must also be tagged with stepladder tags relevant to weekly inspections.

Step Ladders and Ladders must be inspected on a regular basis, following the guidance below:

- ▶ Step Ladders & Ladders which are used infrequently, (less than twice a week), shall be subject to a formal inspection prior to each use.
- ▶ Ladders used regularly, (more than twice a week), in a residential/office environment shall be subject to a visual inspection on daily basis.
If any defects are identified, then the ladder/Stepladder Inspection Form must be completed, and the ladder taken out of service
- ▶ Ladders used regularly in a harsh/construction environment shall be subject to a

visual inspection on a daily basis.

6.5.42 Requirements for Podium Steps

Podium steps are a commonly used, safer alternative to stepladders, as they offer the additional protection of an enclosed platform. Podium steps must have a unique identification number and be tagged with the Stepladder Tag. These must be inspected weekly by a nominated competent person, who in turn must complete the Stepladder Tag and the Weekly Podium Inspection Report completed.

Any defective podium steps must be taken out of service immediately, tagged accordingly and replaced with more suitable podium steps.

21. PREGNANT WORKERS AND NEW MOTHERS

6.5.43 Details

6.5.44

The company shall ensure that any person of childbearing age and who may be pregnant and any mother who is returning to work after childbirth are not exposed to risks to their health, safety and welfare by:

- Assessing the work of any person who may be pregnant
- Assessing the work of any mother who is about to return to work
- Attempting to reduce any exposure to risks
- Finding alternative work where exposure cannot be reasonably prevented,
- Identifying significant risks to the mother, unborn or breast-feeding child
- Identifying and implementing suitable control measures to reduce the risk as far as is reasonably practicable
- Reviewing and monitoring control measures

Pregnancy does not constitute ill health and should be treated as a normal part of everyday life. The health and safety implications can be addressed by sensible precautions.

Once the employee has notified the Human Resources Department (HR) and their Line Manager of their pregnancy, they will inform the expectant mother of their pregnancy and maternity rights etc. A risk assessment form must be completed by the Line Manager in consultation with the employee form within two weeks of the manager being informed of the pregnancy.

Any control measures identified in the risk assessment should be implemented as soon as practicable.

22. Permit to Work

6.5.45 Responsibilities

The Site Manager has overall responsibility for issuing and work subject to a 'Permit to Work'.

Permits to Work may only be issued by the site manager or delegated and trained member of staff, an authorised person using the Permit to Work form. They must be fully completed and signed by the authorising and accepting parties. One copy will be retained by the contractor carrying out the task and one retained in the site H&S file, a record of issue must be recorded on the permit to work register.

Persons issuing permits must satisfy themselves that the following criteria have been met:

1. All hazards have been identified and adequate risk control measures addressed which will include any pre-entry requirements before the permit is sanctioned.
2. Appropriate risk assessment and method statement has been provided by the contractor carrying out the work. This must be task and site specific and describe the control measure required to ensure the work is completed safely. It must include a safe system of work to isolate and/or lock of any equipment or energy sources being worked on. The contractor carrying out the work has been given a complete description of the work to be done and all parties understand it. Competence of the contractor has been determined, via the company contractor vetting process
3. All parts of the permit have been properly completed. The contractor understands that any unforeseen hazards or circumstances that could change the substance of the permit must be reported to the permit issuer immediately so necessary changes can be agreed before work progresses.

Contractors must comply with all aspects of the permit and any failure to do so will result in the cancellation of any uncompleted work and will also prevent the contractor from tendering for any other work at the company.

Final inspection and 'signing off' the Permit to Work may only be done by the General Manager or authorised and trained member of staff from that department.

It should be noted that the overall responsibility for safety of the work lies with the contractor undertaking the works. HFS staff are not responsible for managing the work but has duty to ensure all works are carried out in a safe manner.

6.5.46 Works subject to a permit to work:

Work that will be subject to a 'Permit to Work' will be decided at the planning stage. Work at Heights by default will be subject to a permit. Other examples may include:

- Fragile roofs
- Hot works (e.g., welding, metal cutting)
- Work within plant room
- Work on or near asbestos
- Electrical work Involving high or medium voltage apparatus
- Plant maintenance or dismantling
- Building fabric dismantling or demolition
- Any of the college roof areas.
- Under floor ducts.
- Any lift motor room or shaft.
- Any water tank room.
- Entry into confined spaces Work in confined spaces, where there may be a lack of oxygen or toxic vapour/fumes
- Work involving overhead cranes
- Any work which may be a fire or explosion risk
- Any work requiring the fire alarm system and/or the Emergency Lighting to be offline

The advice of the General Manager must be sought if any doubt exists.

6.5.47 Permit issue:

1. The Authorised Competent Person signing the permit must remain on the premises for the duration of the validity of the permit.
2. The Authorised Competent Person signing the permit must not be part of the working group named on the permit.
3. No permit will be issued without a second person in attendance.
4. The second person is responsible for ensuring that the task being undertaken is within the authority of the permit and that work is carried out within the requirements of the Health & Safety at Work etc. Act 1974 and those stated in the permit.
5. The second person shall also ensure that the area is clear and secure after completion of the work or at the expiry of the permit whichever is the sooner.
6. Where it is necessary for HFS staff to accompany contractors or other people who are not employees of the company into the areas requiring a permit to work then the HFS staff will need to obtain the appropriate permit to work before entering the area. It is the responsibility of the contractors/noncompany employees to ensure that they work within the safety requirements laid down in their contract/working instructions which may include their own permit to work.

All permits must be returned to the issuer on completion of the works for cancellation.

6.5.48 The Permit to work is record is split into five distinct stages:

1. Information relating to the work itself
2. Authorisation for the work to be carried out
3. Acknowledgement of receipt by the person carrying out the work
4. Clearance to say the work has or has not been completed
5. Cancellation, so that the permit can no longer be used

23. Active Health and Safety Monitoring

Active Monitoring Systems

A number of active monitoring systems will be used to identify deficiencies in safety, health, and environmental management. These will allow for remedial action to be taken prior to an accident, incident, or onset of ill health. Such systems will include:

- i) Construction Site inspections.
- ii) Workplace Inspections
- iii) Workplace Inspections by Safety manager
- iv) Hazard Reports
- v) Quality Audit for Contractors and Subcontractors

6.5.49 Workplace Inspections

Workplace Inspections, will be carried out at the frequencies shown below:

- ▶ Regional Operations Manager / General Manager: quarterly
- ▶ General Managers: monthly
- ▶ Site RS Assistant: weekly

Checklists must be specific to each workplace and be based on control measures from Risk Assessment.

- i) Random check of contractor performance shall be carried out by the General Manager using the Quality Audit for Contractors and Subcontractors. The frequency of the

inspections shall reflect the scope and duration of the work being undertaken, a minimum of one review per year shall be undertaken for all contractors.

Copies of Safety Inspection Checklists must be retained for a minimum of 12 months.

Where safety inspections are carried out by other personnel, in addition to those listed above, Subcontractors, Clients etc., they should be discussed during Safety Committee Meetings.

6.5.50 Workplace Inspections by Managers/Engineers

Workplace inspections using hazard checklists should be carried out periodically by Managers. The inspection must include monitoring documentation. These inspections shall be recorded on Managers/Engineers Review Sheet.

6.5.51 Monitoring of Performance

Managers must ensure that first line Supervisors monitor health and safety documentation every month to ensure that they are carrying out their duties.

Evidence that monitoring is undertaken includes:

- ▶ Signing off Inspection Reports
- ▶ Signing off Training Records
- ▶ Signing off Accident/Incident

6.5.52 Workplace Inspections by Safety Manager

The safety Managers will act on behalf of senior Managers to check periodically that the quantity and quality of health and safety monitoring systems are adequate

6.5.53 Workplace Environmental Monitoring

Where applicable and as detailed in the Safety Plan, monitoring techniques will be used to ensure that control measures are effective, e.g.

6.5.54 LEV equipment must be periodically examined.

Radiation workers must have periodic medicals.

Employees exposed to isocyanates must have periodic medicals. Areas containing asbestos will be surveyed.

Environmental consents will be monitored.

6.5.55 Hazard Reports

Employees will be encouraged to report hazards in the workplace to their immediate Supervisor. Where employees feel that the supervisors have not responded, the Hazard Report Form should be completed by the employee and a copy sent to the General Manager. Managers will respond in the appropriate manner following consultation with the Safety Department.

6.5.56 Company Safety Performance

The Company Safety Manager must produce a quarterly Safety Report which details the H&S performance of the Company's work activities. This report will be distributed to the Chief Executive, Directors, Safety Director responsible and all General managers.

6.5.57 Training

Personnel who carry out workplace inspections must be familiar with hazard

identification techniques.

Training of personnel to carry out safety inspections will be included in the Risk Assessment Training Course, and also within the Working/ Managing Safely.

6.5.58 Information

Details of inspections and other active monitoring techniques will be included in the location Safety Plan.

24. Accident / Incident Investigation and Reporting Procedure

All Accident Procedures are in accordance with the guidance on the Under The Health and Safety at Work, etc Act 1974 and the Workplace (Health, Safety and Welfare) Regulations 1992, It is important that all accidents and incidents with potential for injury are reported to management and, where necessary, action is taken to prevent recurrence.

Accident, incident and near miss/ ill health and fire procedure:

The purpose of this procedure is to advise on how to record, investigate and report any incidents that result in injury, ill-health, disease, dangerous occurrence, near-miss or fire incidents, involving Home for Student's employees, students, visitors/guests, and contractors on our properties.

The following process must be followed to ensure that Homes for Student employees identify and report any of the following that are related to their properties or activities. Hereafter, these will be collectively called 'incidents';

- Accidents/incidents, and dangerous occurrences
- Near miss,
- Work Related Ill Health,
- Fire (incidents)
- Unwanted Fire Alarm Activation

Homes for Student Management will ensure that all employees are aware of their duty to report and record all incidents. General Managers, Operations Managers and Senior Portfolio Manager and Portfolio Managers must investigate all incidents involving their staff, students/guests, and contractors. The investigation should look to identify principal and underlying causes of the incident and implement where reasonably practicable, corrective actions to prevent similar occurrences in the future.

All incidents will be recorded by the General Managers on the Homes for Students dedicated property incident and accident report form (which is available on Connect), for our Mapletree properties, please ensure that you are using the correct property incident and accident report form as this reflects the way in which the client wants these incidents to be recorded. A request for an incident number is to be made within 24 hours (or the next working day) by using the email address incidents@wearehomesforstudents.com. The National Health and Safety Manager MUST be informed of any accident as soon as practicable; this can be done either by a phone call, a short descriptive email marked urgent and by being copied into the email requesting an incident number.

All Near misses are to be recorded on the **CS-HS402 Form 01 Near Miss/Safety Concern Reporting Form**, which will be used in conjunction with **CS-HS-400 Near Miss Guidance Notes** (both forms are located on connect).

All sections of the property incident and accident report form **MUST** be completed, giving a detailed and accurate account of the incident. Any relevant witness statements and/or documentation must be attached before submitting to the incident email address with the National Health and safety Manager in copy.

In the first instance Operation Managers and/or the Portfolio Managers in conjunction with the General Manager will investigate all near misses. Following the completion of the above form and the subsequent investigation, this will be emailed to the National Health and Safety Manager for further review and if required a further investigation will take place.

Please note that all accidents relating to Contractors will be recorded on CS-HS402 Form 04 Minor Accident Report Form – External Contractors (1), which can be found on Connect within the Health and Safety Hub. The Health and Safety team will undertake regular reviews of all incidents and will supply reports to the Compliance and Procurement Director, which in turn will be submitted to on a monthly basis.

The Health & Safety Team in particular the National Health and Safety Manager will ensure any statutory Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 are made to the enforcing authority as required.

Arrangements for accident investigation:

The General Managers/Operations Managers/Senior Portfolio Manager, Portfolio Managers and Operational Director initial investigations form an essential part of the health and safety monitoring process. Investigating incidents will help to uncover any system or environment failures, training needs or breaches of legislation.

The purpose of an investigation is to:

- Gain an understanding of how and why things went wrong. You can keep asking yourself “why” to arrive at the root cause.
- Gain an understanding of the way employees can be exposed to substances or conditions that may affect their health.
- Gain an understanding of what really happened and how work is really being carried out.
- Identify deficiencies in risk control management, which will enable you to improve your management of risk in the future and to learn lessons which will be applicable to other parts of the organisation.
- Help prevent reoccurrence of further similar incidents.
- Not apportion blame to individuals.

To undertake a successful investigation, the following will be undertaken:

- Gather as much information about the accident/incident as possible e.g., witnesses, was equipment involved and subsequently made safe, was the person authorised to carry out the task and was training up to date.
- Analyse the information being objective and unbiased, identifying sequence of events and conditions that led to the accident/incident, identifying the cause of the accident/incident.
- Identify the risk control measures which were missing, inadequate or unused.
- Compare conditions/practices, identify any additional measures needed to address the immediate, underlying root causes, and
- Provide recommendations which can be implemented.
- Provide an action plan and implement corrective action where required

All accident reports are reviewed by the National Health and Safety Manager or by a member of the Health and Safety team to ensure the accident report form has been completed correctly and that General Manager or the Operational Manager have carried out an initial investigation of all accident/incidents involving their team or workplaces.

There are three possible outcomes from the review process:

- **Follow up** – to identify and clarify some minor deficiencies, this may involve a conversation either on the telephone or face to face with the injured party, witnesses and/or the responsible line manager/supervisor regarding the event. Likely causes, consequences and actions taken to prevent recurrence or mitigate the consequences will be confirmed. The accident report system will be updated with the information required and filed.
- **File** – providing all sections of the accident report form are completed, the accident is minor in nature and initial investigation (by responsible General Manager, Operations Manager or Senior Portfolio Manager and Portfolio Managers) is adequate.
- **Investigation** – to ensure immediate and underlying/root causes are identified and suitable controls are implemented for significant accidents.

Where required the National Health and Safety Manager will carry out an investigation and produce an accident/incident investigation report, which will be submitted to the Compliance and Procurement Director.

As part of the investigation the National Health and Safety Manager or in their absence a member of the Health & Safety Team may visit the scene of the accident/incident to identify the immediate and root cause of the event, and to agree any actions to be taken to prevent recurrence or mitigate the consequences. They may or may not be accompanied by the injured party, line manager/supervisor, or H&S representative etc.

Written statements will be taken from any identified witnesses and photographs may be taken to clarify statements within the accident report form. Legislation and internal risk assessments, procedures etc., will be considered as well as specific operational considerations.

The accident/incident investigation report will be shared with the Responsible General Manager, and the Senior Portfolio Manager, Portfolio Managers and Operational Managers, who will ensure that recommendations are completed within an agreed timescale.

All accidents must be recorded within the accident book for that property, once the accident has been recorded within the accident book the following will take place:

- The completed accident form is to be removed from the accident book ensuring that the accident number is present on both the accident page/form and within the accident book (this will be numbered in a numerical order).
- The completed form is to be scanned, attached to the property incident/accident report form and sent through to the incident inbox which will be held centrally.
- Once the accident form and the property incident/accident report form has been sent through to the incident inbox, incidents@wearehomesforstudents.com the hard copy from the accident book is to be SHREDDDED.

To ensure that we are GDPR compliant it is imperative that the hard copy of the accident form is shredded. Please note as the General Manager it is your responsibility to ensure that all accidents are recorded within the accident book, attached to property incident/accident report form and that the hard copy of the accident form is shredded.

Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995

The Regulations apply if you are an employer, self-employed or in control of work premises, for clarification, when a self-employed person is injured while working for a sub-contractor on a large building site, controlled by a main contractor, the main contractor must report the incident. If the injured self-employed person is working in their own premises, or in other premises under their control, they must report the injury.

Where an accident is connected with work and:

- the employee or a self-employed person working on your premises is killed or suffers a major injury; or
- a member of the public is killed or is taken to hospital

The enforcing authority will be notified without delay by telephone and an online form will be completed through the HSE portal:

The classification of Major Injuries;

- A fracture, other than to fingers, thumbs & toes
- Amputation of an arm, hand, finger, thumb, leg, foot or toe
- Permanent loss of sight or reduction of sight
- Crush injuries leading to internal organ damage
- Serious burns, (covering more than 10% of the body, or damaging the eyes, respiratory system, or other vital organs)
- Scalping, (separation of the skin from the head), which require hospital treatment
- Unconsciousness caused by head injury or asphyxia

- Any other injury arising from working in an enclosed space, which leads to hypothermia, head-induced illness or requires resuscitation or admittance to hospital for more than 24 hours.

Over three-day injuries:

If there is an accident connected with work and an employee or self-employed person working on your premises, suffers an over three-day injury, you must send a completed accident report form (NI 2508) to the enforcing authority. An over-the-three-day injury is one which is not major but results in the injured person being away from work, or unable to do their normal work or full range of work for more than three days (including non-workdays).

The day of the accident should not be counted, only the period after it. Any days the injured person would not normally have been expected to work, such as weekends, rest days or holidays, must be included.

Dangerous occurrences:

A dangerous occurrence is when something happens which does not result in a reportable injury, but which clearly could have done, then it may be a dangerous occurrence which must be reported immediately for example by telephone. An employer must then follow this up with a completed accident report form.

Reportable dangerous occurrences are as follows:

- Collapse, overturn or failure of load-bearing parts of lifts and lifting equipment
- Explosion, collapse or bursting of any closed vessel or associated pipework
- Failure of and freight container in any of its load bearing parts
- Plant or equipment coming into contact with overhead power lines.
- Electrical short circuit or overload causing a fire or explosion.
- Any unintentional explosion, misfire, failure of detonation to cause the intended collapse, projection of material beyond a site boundary, injury caused by an explosion
- Accidental release of a biological agent likely to cause severe human illness
- Failure of industrial radiography or irradiation equipment to de-energise or return to its safe position after the intended exposure period
- Malfunction of breathing apparatus while in use or during testing immediately before use
- Failure or endanger of diving equipment, the trapping of a diver, an explosion near a diver or an uncontrolled ascent
- Collapse or partial collapse of a scaffold over 5 metres high or erected near water where there could be a risk of drowning after a fall
- Unintended collision of a train with any vehicle
- Dangerous occurrence at a well (other than a water well)

- Dangerous occurrence at a pipeline
- Failure of any load bearing fairground equipment or derailment or unintended collision of cars or trains
- A road tanker carrying a dangerous substance overturn, suffers serious damage, catches fire or the substance is released
- A dangerous substance being conveyed by road is involved in a fire or is released
- Unintended collapse of any building or structure under construction, alteration or demolition where over five tonnes of material falls; a wall or floor in a place of work; any false work
- Explosion or fire causing suspension of normal work for over 24 hours
- Sudden uncontrolled release in a building of 100 kg or more of flammable liquid; 10 kg of flammable liquid above its boiling point; 10 kg or more of flammable gas; or of 500 kg of these substances if the release is in the open air
- Accidental release of any substance which may damage health

Disease:

Should a doctor and/or medical practitioner inform Homes for Students that an employee suffers from a reportable work-related disease, then a completed disease report form will be completed and sent through to the enforcing authority. The reportable diseases are listed in the booklet accompanying the Regulations.

Record keeping of RIDDOR incidents:

Homes for Students will keep a record of any reportable injury, disease, or dangerous occurrence. This will include the date, the method of reporting, along with the date, time and place of the event, personal details of those involved and a brief description of the nature of the event and/or disease. As required by legislation all RIDDOR reports will be kept for a minimum period of three years.

Further information and guidance:

The National Health and Safety Manager or a member of the Health and Safety team can provide further advice on accident recording and reporting by contacting them directly or by email. In addition to this document (Reporting Accident/Incidents, Near miss/ill-Health and fire incidents), an accident flowchart (CS-HS-110 Form 04 – Accident Flowchart) has been devised/implemented to assist you should an accident occur.

All unwanted fire signals (fire alarm activations due to cooking, steam from bathroom etc) are to be recorded on Main Manager as per the Main Manager SOP and is to be recorded on CS-HS-308 Form 10 - False Alarm Activation Record.

6.5.59 Industrial Diseases

Upon being made aware that an employee is suffering from a work-related disease, the matter should be discussed with the General Manager who will determine whether the employee has a reportable disease and carries out a work activity that corresponds with those listed in Schedule

3 of RIDDOR.

The previous list of 47 types of industrial disease is being replaced with eight categories of Reportable Work-Related Illness, these are:

- ▶ Carpal tunnel syndrome
- ▶ Severe cramp of the hand or forearm
- ▶ Occupational dermatitis
- ▶ Hand-arm vibration syndrome
- ▶ Occupational Asthma
- ▶ Tendonitis or tenosynovitis of the hand or forearm
- ▶ Any occupational cancer
- ▶ Any disease attributed to an occupational exposure to a biological agent

If the disease satisfies the above criteria the General Manager will:

- ▶ Investigate the circumstances.
- ▶ Where necessary arrange for a Company appointed doctor to confirm the disease.
- ▶ Notify the HSE/EHO by copy of F2508 (D).
- ▶ Retain copies of F2508 (D) and correspondence at Health Office.
- ▶ Notify Regional Operations Manager.

6.5.60 Records

Copies of Accident/Incident Form will be retained at Head Office for a minimum period of 5 years. Electronic recording of accidents will be retained at Head Office for a minimum period of 10 years.

In addition to the above the Company Solicitor and Insurance Company is to be informed. Accident/Incident Reports and any statements must be sent to the Company General Manager

The information detailed above will be retained for use by the insurance company.

6.5.61 Statistics/Reports

The Company Safety Data System will be used to compile statistics, analyse trends and produce data for reports. Safety performance will be measured on a continuous basis and a quarterly report produced for circulation to Managers.

25. Occupational Health Monitoring Procedure

6.6

6.7

6.7.1 THE AIMS OF THE FUNCTION ARE TO

- ▶ Carry out necessary medical screening for any staff working with processes, materials or substances that require them to receive medical supervision;
- ▶ Provide advice and training on ergonomics, especially relating to computer technology and manual handling;
- ▶ Carry out environmental surveys and risk assessments and to provide advice on issues relating to workplace ergonomics, occupational hygiene and safety. This work is often undertaken in conjunction with the Safety Officer;
- ▶ Supervise the company team of first aiders, co-ordinate first aid training and the provision of first aid supplies;
- ▶ Offer a variety of health education and health promotion programmes to encourage the health and fitness of all members of staff;

- ▶ Monitor sickness absence and provide sickness absence statistics, counselling and advice to managers and individuals;
- ▶ Offer counselling support for staff to complement other welfare services offered by HR
- ▶ Carry out pre-employment screening by medical questionnaire, interview and medical examination where appropriate;
- ▶ Give general medical and health advice and information to all members of staff when requested.
- ▶ Advise HR and line managers in the event of illness on the fitness to return to work and/or rehabilitation needs of individuals. Assist those individuals when they return to work to enable them to settle into their work pattern with minimum stress and disruption.

6.7.2 ACTIVE MONITORING SYSTEMS

A number of active monitoring systems will be used to identify occupational health risk. These will result in improved control measure and implementation of remedial action to be taken, to protect the Health Safety and Welfare of all and prevent ill health. Such systems will include:

- Pre-employment health questionnaire.
- Completion of in-service health Surveillance questionnaire on a 3-year cycle.
- General Risk Assessments process, other procedures used to control occupational Health are listed below:
 - a. COSHH Risk Assessments
 - b. DSE risk assessments
 - c. Hand Arm Vibration
 - d. Noise Risk assessment
 - e. Reparable dust
 - f. Control of Legionella
 - g. Control of manual handling
 - h. Control of Asbestos
 - i. New and Expectant Mothers
 - j. Dermatitis Toolbox talks.
- Monitoring of sickness and absence
- Return to work interviews
- Accident and Incident Investigation and Reporting Procedure

- Workplace Inspections, construction
- Workplace Inspections, general Sites
- Workplace Inspections by Safety manager
- Hazard Reports hazard reporting form

6.7.3 Industrial Diseases and illnesses

Upon being made aware that an employee may be suffering from a work-related illness or disease, the matter shall be reported to the General Manager who will determine whether the employee has a reportable disease and carries out a work activity that corresponds with those listed in Schedule 3 of RIDDOR.

If the disease satisfies the above criteria the Safety Manager will:

- ▶ Investigate the circumstances. Notify the HR Manager.
- ▶ Where necessary arrange for a Company appointed doctor to confirm the disease.
- ▶ Notify the HSE/EHO by copy of F2508 (D).
- ▶ Retain copies of F2508 (D) and correspondence at Head Office.
- ▶ Notify Unit/Branch Manager.

6.7.4 Pre-employment screening

All offers of appointment made to external candidates are subject to completion of a pre-employment health questionnaire. Where necessary medical clearance by appropriately qualified Occupational Health Professional will be requested. All people who accept an offer of

employment must complete a confidential medical questionnaire and forward it to the HR. If further information is required, the individual may be contacted by an occupational Health Professional or Medical Advisor. A final contract of employment will not be issued until medical clearance has been issued to HR.

6.7.5 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. For example, individuals handling substances which are controlled under COSHH (The Control of Substances Hazardous to Health Regulations) are required to be medically screened to monitor for harmful effects. The company will carry out, as appropriate, medical screening programmes to monitor individuals working with such hazards.

6.7.6 Sickness absence

The transition from illness to wellbeing and work can be a traumatic experience, especially if an individual has been away from work for some time. By dealing with people in a sensitive and pragmatic way, we can help them make the transition effectively.

Sickness absence monitoring and follow-up will be carried out to:

- ▶ Assess the level of skill, physical and mental capacity needed for effective performance at work.
- ▶ Evaluate whether there are any adverse effects the work or working environment are having on the individual.
- ▶ Consider whether the individual's condition is likely to make it difficult for him/her to do the job safely, without endangering others and to vacate the building under emergency conditions.
- ▶ Assist in a speedy return to work where appropriate.
- ▶ Identify any possible work-related disease or illnesses.

6.7.7 Employee Hazard Reports

Employees will be encouraged to report hazards in the workplace to their immediate Supervisor, this will include and suspected or diagnosed health related disease or illnesses. Where employees feel that the supervisors have not responded, the Hazard Report Form should be completed by the employee and a copy sent to the Line Manager. Managers will respond in the appropriate manner following consultation with the Safety Department.

6.7.8 Company Safety Performance

The General Manager shall produce a quarterly Safety Report which details the H&S performance of the Company's work activities, including occupational health issues. This report will be distributed to the Chief Executive, Directors, and all site managers.

6.7.9 Training

Personnel who carry out workplace inspections must be familiar with hazard and controls for their job roles as described in the workplace risk assessment.

Training of personnel on occupational health will include:

- ▶ Manual Handling awareness
- ▶ COSHH
- ▶ Toolbox talks on
 - Dermatitis
 - DSE
 - Legionella
 - Reparable dust
 - Asbestos awareness.

6.7.10 Information

Details of inspections and other active monitoring techniques will be included in the location Safety Plan.

6.7.11 Equality and Diversity: Equal Opportunities Policy

We are committed to promoting Equal Opportunities in the provision of our services and in the employment of staff and contractors, regardless of race, colour, nationality, ethnic and national origin, religion or belief, disability, age, gender, marital status, or sexual orientation.

Our commitment includes Minicom facilities at our sites, trained sign language staff, disabled access, and facilities at both our offices and workplaces. We also offer upon request:

- A translation service in written form, i.e., the Association's policies, and in the form of a three-way telephone conversation
- Documents recorded onto tapes
- Documents written in Braille

26. System Review

Review Process

The Executive Team will review company philosophy and strategy in relation to regulatory Property and philosophy on matters of Health and Safety. The meetings are held monthly, where H&S matters are reviewed. A monthly H&S report is produced for the company Managing Director, and these are reported to the quarterly board meetings.

The carry out an annual review of H&S performance. This review is used to direct the Company objectives for the annual H&S Plan, and progress towards achievement of these objectives is reviewed during scheduled meetings. These meetings are scheduled on a quarterly basis and minutes are issued.

Included in the first quarterly meeting will be a review of the previous year's results of the H&S Management System. The review shall include:

- Results of Internal and External Audits
- Trend Reports on accidents, incidents
- Status of preventive and corrective actions
- Customer satisfaction feedback
- Changes that could affect the H&S Management System and recommendations for improvement
- Review of the H&S Policy Statement

Departmental Managers may also carry out a specific management review relevant to their operations.

The content of the meeting will suit their requirements.

Health and Safety shall feature on the agenda of monthly Management meeting. Action notes are issued following the meetings and close out of action is monitored at subsequent meetings.

The General Manager will act as a support function which provides advice, guidance, training, and monitoring to the organisation to allow Health and Safety objectives to be realised. The General Manager shall monitor, progress against the annual H&S objectives, this is also reviewed during regular One to One meetings between General Manager and their line manager (Senior Portfolio Manager, Portfolio Managers and Operational Managers)

They are responsible for review of the Health and Safety Management System and corresponding update of documentation and action plans. They will meet on a regular basis.

6.7.12 Information Reviewed

Active Monitoring of H&S performance is achieved through:

- Directors Safety Inspections
- Management Safety Inspections
- H&S Managers Safety Inspections
- Internal audits
- External Audits
- Weekly fire safety checks

Close out of recommended actions by the individuals assigned the actions within agreed timescales, is monitored by the and information provided to Company Directors on a monthly basis. Trends are monitored and the information gathered may then be fed into action plans.

Reactive Monitoring of safety performance is conducted through analysis of Accident / Incident / Near Miss Reports and investigations, trends in work related ill health data, etc. Close out of recommended actions by the individuals assigned the actions within agreed timescales, is monitored by the General Manager and statistics and trends reported at various review meetings.

Health and Safety training is reviewed by the Directors, Board Meetings, and by HR following staff appraisals. This review covers Property with targets, comprehension and competence issues.

6.7.13 Key Performance Indicators

The Company has established a number of Key Performance Indicators (KPIs) used to monitor business performance. Accident Frequency Rate, a KPI relating to Safety Performance, is reported on a monthly basis and reviewed against the Company target of ZERO.

The degree of Property with audits is also monitored.

6.7.14 Provision of Information

Information on Health and Safety performance is made available in a number of ways. Monthly reports are compiled and issued to various members of staff; accident trends are published on the Intranet; newsletters, alerts, posters, and targeted training to cover specific items; safety committees discuss performance, and this is reflected in minutes which are posted on notice

boards.

6.7.15 Feedback into System

The reviews Property with Health, Safety and Environmental Plans and targets and appropriate actions are fed back into the functional action plans for implementation, monitoring and review.