DULWICH COLLEGE
FOUNDED 1619

Health & Safety Policy

September 2025

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Document Control

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Health and Safety Policy Statement

The Governors recognise and accept their responsibility as the employer for providing, in accordance with the law, workplaces and work practises which are safe and healthy for employees, for pupils, for visitors including contractors, and for anyone else who might be affected by their work activities. In particular, care will be taken to provide and maintain:

- Safe premises;
- Safe places of work with safe access and egress;
- Safe plant and equipment;
- Proper arrangements for the use, handling, storage and transport of articles and substances;
- Information, instruction, training and supervision for safety and safe systems of work;
- A safe and healthy working environment throughout;
- Appropriate communication with employees; and
- Committee arrangements for the consideration of health and safety matters.

The day-to-day duty of ensuring health and safety rests with the Master/COO at each site and without detracting from this primary duty health and safety matters will be administered by the COO who will work on behalf of the Governors by providing and interpreting policy.

The Governors will provide competent professional health and safety advice and additional resources when required.

The COO must report to Governors at least annually on all significant health and safety matters and as and when there is a major accident or incident.

Employees must be mindful of their own duties to take care of their own personal health and safety and that of fellow employees, pupils and other persons who might be affected by their work activities. All employees have the duty to co-operate with the employer to ensure good safety management and to comply with the health and safety policy.

Details of the organisation for health and safety management and the arrangements for policy compliance are to be found in the compliance documents following.

This Policy will be continually monitored and updated, particularly when changes in the scale and nature of our operations occur. The Policy will be updated at least every 12 months.



Dr Adrian Carr
Chair of the Governors
25 September 2025

Health and Safety Roles and Responsibilities

Governors

Overall Responsibility: Ensure Dulwich College complies with The Health and Safety at Work etc. Act 1974, and all Regulations made under this enabling Act. Monitor and evaluate the College's health and safety performance, ensuring effective management by the Master and the COO.

Duties:

- Ensure adequate resources for effective health and safety management.
- Endorse Dulwich College's health and safety policy in collaboration with the Master and COO.
- Endorse the Health and Safety Strategy.
- Regularly review health and safety performance metrics and reports presented by the COO.
- Hold the Master and the COO accountable for health and safety performance, ensuring that high standards are maintained at all times.
- Provide strategic guidance and support to the Master and the COO in their efforts to maintain a safe and healthy school environment.

Master

Overall Responsibility: Provide overall leadership and strategic direction for health and safety at Dulwich College, ensuring compliance with The Health and Safety at Work etc. Act 1974, and all Regulations made under this enabling Act. Additionally, they are responsible for ensuring that effective leadership on health and safety matters is provided by the COO.

Duties:

- Oversee the development and implementation of the College's health and safety policy, ensuring it aligns with the College's values and legal requirements.
- Act as a key strategic liaison between the Governors and the COO for health and safety matters.
- Ensure the health and safety strategy is integrated into the College's overall strategic plan and objectives.
- Review and endorse the annual Health and Safety Strategy as prepared by the COO.
- Provide support and resources to the COO for the implementation of health and safety measures.
- Ensure a culture of safety is promoted throughout the College, emphasising the importance of health and safety at all levels.
- Supporting and holding the COO accountable for responding to major health and safety incidents, ensuring that they are managed effectively and that lessons are learned to prevent future occurrences.

Chief Operating Officer (COO)

Overall Responsibility: Manage the daily operational aspects of health and safety at Dulwich College, ensuring effective implementation of policies and procedures, and overseeing departmental compliance.

Duties:

- Implement and enforce Dulwich College's health and safety policy, ensuring it is integrated into all operational & academic activities.
- Coordinate with department heads to ensure that health and safety practices are understood and followed within their respective areas.
- Ensures that all departments have a suitable and sufficient risk assessment completed and that this is updated regularly.
- Provide leadership and support to department heads in managing health and safety, ensuring they have the necessary resources and training.
- Ensure a culture of safety is promoted throughout the College, emphasising the importance of health and safety at all levels.
- Monitor and review health and safety management and performance across the College, identifying areas for improvement and implementing corrective actions.
- Ensure effective communication of health and safety matters to all staff, fostering a culture of health and safety awareness and compliance.
- Manage and respond to health and safety incidents, ensuring prompt investigation and reporting to the Master and Governors as appropriate.
- Engage with the Governors to report on health and safety performance and strategic developments.
- Regularly report to the Master on health and safety performance, challenges, and progress.
- Liaise with external health and safety advisors and regulatory bodies as necessary to ensure compliance with current health and safety legislation.
- Working alongside the Master to respond to major health and safety incidents, ensuring that they are managed effectively and that lessons are learned to prevent future occurrences.

Health and Safety Manager

Overall Responsibility: Reporting to the COO, they will strategically lead, oversee, and ensure the safety and compliance of all academic and operational activities at Dulwich College. Lead implementation of health and safety policies, and providing a centralised support function for all staff within the College. Above all, to ensure a safe and healthy environment for students, staff, contractors, volunteers, and visitors.

Duties:

- Oversee the development, implementation, and periodic review of health and safety policies and procedures.
- Ensure the College's health and safety framework aligns with current legislation and best practices.
- Serve as the primary point of contact for health and safety matters, offering expert advice across Dulwich College.
- Collaborate with external health and safety consultants to maintain a robust and consistent approach.
- Review, monitor, and ensure departmental risk assessments are suitable, sufficient, and actionable.
- Provide guidance and support to staff ensuring compliance with College risk management processes.
- Support departmental heads and supervisors, in the development and implementation of specialist risk assessments and safe systems of work, where necessary.

- Conduct regular health and safety inspections and audits across the campus, identifying risks and recommending improvements, ensure timely completion of follow-up actions arising from audits and inspections.
- In consultation with the COO, and in collaboration with External Health and Safety Advisors where required, lead and support incident investigations to determine root causes and ensure corrective actions are implemented effectively.
- Deliver engaging, practical health and safety training tailored to departmental needs.
- Promote a positive, proactive approach to health and safety, inspiring staff to embrace their responsibilities.
- Ensure visitor safety by supporting effective visitor management systems and procedures.
- Ensure volunteer safety by supportive effective volunteer management systems and procedures.
- Oversee the organisational training needs matrix, working with Heads of Departments and Line Managers to ensure coordination of health and safety training programmes are completed by staff.
- Maintain and update health and safety records, ensuring compliance with legal and internal requirements.
- Monitor the effectiveness of communication strategies and suggest improvements to ensure clear and effective dissemination of health and safety information.

**It is noted that at this time that the Health and Safety Manager responsibilities are managed by the organisations external Health and Safety Advisor(s), until such time an appointment into this role is made.*

PA to the COO

Overall Responsibility: Coordinate and facilitate the communication and administration of health and safety matters within Dulwich College, acting as a key point of contact between the COO, department heads, and the external Health & Safety Advisors.

Duties:

- Assist the COO in organising and managing health and safety documentation, including policies, procedures, and reports.
- Support, and coordinate in absence of the Health and Safety Manager, accident and near miss reporting and any follow up action required (including RIDDOR reporting) with the COO, Director of Educational Operations, External Health & Safety Advisors, Heads of Departments, and College Staff, as applicable.
- Arrange and facilitate health and safety meetings, training sessions, workshops and audits, ensuring relevant parties are informed and involved.
- Distribute health and safety updates, guidelines, and alerts to department heads and staff as directed by the COO, Health and Safety Manager, & External H&S Advisors.
- Assist in the preparation of health and safety performance reports for the COO, Master, and Governors.
- Act as a liaison for health and safety inquiries within the College, directing queries to appropriate parties, including external Health and Safety Advisors.

Director of Educational Operations

Overall Responsibility: Reporting to the COO, strategically manage, oversee, and ensure the safety and compliance of all transport and co-curricular and pupil-based trips and outings.

Duties:

- As the College's Educational Visits Co-ordinator, maintain an overview of the safety and proper organisation of outings and expeditions (including use of Evolve), liaising with staff across relevant departments.
- Work with teaching staff planning trips to ensure suitable planning and risk assessment activities are completed.
- Assist in implementing health and safety policies, ensuring operational compliance with standards.
- Feed into the health and safety requirements for major school events working in collaboration with the Events and Catering Teams, Head of Facilities, and the Health and Safety Manager.
- Act as a conduit between teaching staff and operational departments, ensuring smooth day-to-day operations and effective communications on matters relating to health, safety, and wellbeing.
- Undertake on-going review of the College's accident and near miss reporting system (Evolve).
- Support the implementation of training and ongoing health and safety requirements for Friends of Dulwich volunteers.
- Take responsibility for health and safety matters relating to coaches, school minibuses, and other vehicles (including hired) used for pupil transport.
- Work closely with the Director of Commercial Enterprise to ensure the safe operational management and College use of the Outdoor (Glyntawe) Centre in Wales.

Head of Property and Maintenance

Overall Responsibility: Strategically manage, oversee, and ensure the safety and compliance of all maintenance operations and activities within Dulwich College, and at its offsite properties, including Contractor Management and the control of health hazards like Asbestos and Legionella, and overseeing key areas such as visitor safety, and construction project safety.

Duties:

- Develop and implement comprehensive health and safety plans (or programmes) for the College's facilities, ensuring they align with overall health and safety policies, in conjunction with the COO, Health and Safety Manager, and External Health and Safety Advisors.
- Develop and implement maintenance safety policies and procedures in line with the College's overall health and safety strategy.
- Manage and monitor the health and safety performance of contractors working on the College premises, ensuring their compliance with health and safety regulations.
- Oversee, with Head of Facilities, and regularly review fire safety measures, including actions from fire risk assessments, fire prevention strategies, and emergency response plans.
- Conduct regular health and safety audits and risk assessments of maintenance activities and areas, implementing necessary improvements.
- Oversee the control and management of asbestos and legionella ensuring compliance with legal standards and best practices.

- Ensure that all maintenance activities, including repairs, installations, and renovations, are performed safely and in accordance with established guidelines.
- Ensure training is completed by maintenance staff on health and safety matters, ensuring they are aware of and adhere to relevant safety procedures.
- Coordinate with the COO and Health and Safety Manager to address any facility-related safety issues and ensure a cohesive approach to maintenance and safety.
- Ensure that maintenance staff and contractors comply with site rules regarding vehicle movements.
- Maintain accurate records of maintenance activities, health and safety inspections, and compliance checks.
- Provide regular reports to the COO on the status, challenges, and progress of estate and maintenance-related health and safety matters.
- Ensure contractor safety by implementing effective contractor management systems and procedures.
- Oversee the health and safety aspects of construction projects, ensuring compliance with The Construction (Design and Management) Regulations 2015, Building Regulations 2023 (merged), and other health and safety regulations and standards.
- Regularly inspect (or delegate inspections of) College facilities for potential safety hazards, initiating corrective actions as needed.
- Ensure that the College's buildings and infrastructure comply with all relevant building and health and safety regulations.
- Respond effectively to maintenance-related emergencies or incidents, ensuring prompt resolution and mitigation of any safety risks.

Head of Facilities

Overall Responsibility: Strategically manage, oversee, and ensure fire safety and compliance within Dulwich College and at its offsite properties and locations, overseeing key areas such as fire safety, traffic management, and visitor safety.

Duties:

- Oversee and regularly review fire safety measures, including actions fire risk assessments, fire prevention strategies, and emergency response plans.
- Ensure central training and guidance to staff on fire safety matters, ensuring they are aware of and adhere to relevant safety procedures.
- Coordinate with the COO and Health and Safety Manager to address any fire safety issues and ensure a cohesive approach to fire prevention and safety.
- In consultation with Health and Safety Manager, oversee internal traffic systems to ensure safe movement of vehicles and pedestrians within the College premises.
- Maintain accurate records of fire-related activities, inspections, and compliance checks.
- Provide regular reports to the COO on the status, challenges, and progress of fire measures and security related issues across the Campus.
- Ensure training is completed by site officers on health and safety matters, ensuring they are aware of and adhere to relevant safety procedures.

- Ensure contractor safety by following effective contractor management systems and procedures.
- Ensure visitor safety by following effective visitor management systems and procedures.

Heads of Departments

Overall Responsibility: Lead and manage the implementation of health and safety policies within their respective departments, ensuring a safe working and learning environment for employees, pupils, and visitors.

Duties:

- Ensure compliance with the College's health and safety policy and standard suite of risk assessments.
- Where required by this Policy, or upon request of the Health and Safety Manager, conduct and carry out regular review of risk assessments, safety systems of work, and control measures specific to the department or activity.
- Ensure that all departmental activities are carried out safely and in accordance with risk assessments.
- Ensure mandatory and department specific training is completed, ensuring staff are aware of and adhere to relevant safety procedures.
- Ensure suitable instruction, information, and supervision is provided to staff within the department.
- Maintain a focus on both employee and pupil health, ensuring appropriate measures are in place.
- Report and record any near misses, accidents, incidents of occupational ill health, and hazardous occurrences, taking corrective action as required.
- Where requested, support the COO and Health and Safety Manager during any incident investigates.
- Report any accident and near miss events via Evolve, ensuring that any findings are managed effectively, corrective action is taken where required, and that lessons are learned to prevent future occurrences.
- Ensure a suitable number of departmental first aiders are appointed and appropriately trained.
- Prepare and provide regular health and safety reports to their senior line manager (CLT member).
- Ensure that any College owned vehicles for which they are responsible are taxed, MOT'ed and subject to routine inspections, and that their staff are instructed in the safe use of those vehicles to ensure compliance with the College's traffic management rules.

Additional Duties for All Staff

Overall Responsibility: Actively participate in and contribute to the maintenance of a safe and healthy environment at Dulwich College.

Duties:

- Adhere to the College's health and safety policy and standard suite of risk assessments.
- Remain vigilant and report any potential hazards including near misses, incidents, or unsafe conditions via Evolve or directly to the PA to the COO, Health and Safety Manager, or via the dedicated Health and Safety mailbox.
- Staying informed of the latest health and safety arrangements and emergency procedures in place and participate in regular health and safety training and fire/incident drills organised by the College.

- Participate and contribute to health and safety initiatives relevant to their department or role.
- Contribute to a positive health and safety culture by engaging in open communication about health and safety issues and encouraging others to do the same.
- Take personal responsibility for not only their own safety but also the safety of colleagues, students, and visitors.
- Provide feedback and suggestions for improving health and safety practices within the College.
- All staff are responsible for ensuring compliance with the College's traffic management procedures and the safe operation of any vehicle within their charge.

Volunteers

Overall Responsibility: Observe and comply with College specific rules and instructions provided to ensure continued success of volunteer programmes and a safe learning and working environment.

Duties:

- Adhere to all relevant health and safety policies and procedures.
- Comply with all health and safety requests asked of them by Dulwich College.
- Attend and/or complete all relevant health, safety, and fire training.
- Notify Dulwich College supervisor or senior management team of any concerns, risks, or incidents observed during their activities at Dulwich College or other external locations when representing the College.
- Ensure that any tools or equipment provided for the purposes of carrying out volunteer activities is used correctly and only where approved.

Contractors and Third-Party Providers

Overall Responsibility: Observe and comply with College specific rules and lead and manage the implementation their own company health and safety policies for their respective disciplines as specialist providers to the College, ensuring a safe working and learning environment for employees, pupils, and visitors alike.

Duties:

- Adhere to all relevant statutory requirements that apply to the work they are carrying out.
- Demonstrate proof of their employees training and competence prior to their appointment.
- Ensure that work is adequately discussed with Dulwich College representatives to identify potential hazards and risks to the H&S of occupiers of premises, employees, other contractors employees, or members of the public, prior to works being undertaken.
- Provide detailed methods of working including their sequence of operations and risk assessments for the specific projects.
- Acknowledge, accept, and follow any Dulwich College provided site instructions and/or work procedures.
- Brief their own employees or Sub-Contractors on site safety issues, method statements and procedures, in addition to the completing the Dulwich College site induction.
- Provide suitable and adequate protective clothing to their employees. In compliance with H&S law, all persons working in relevant appointments e.g. maintenance, facilities, and grounds, are to wear

safety footwear at all times when on site together with additional PPE as necessary as well as any employer provided corporate clothing.

- All Contractor/Visitors issued lanyard and pass provided for identification and security purposes, this must be worn at all times on site.
- Cooperate and coordinate their operations with the Property and Maintenance Manager, Maintenance Works Manager, and Head of Projects and Planning (as applicable), throughout the works.
- Provide suitably skilled Supervisors who are competent in trade activities and H&S to ensure the work is carried out correctly and is in compliance with site rules and procedures and the above-mentioned legal requirements.

External Health & Safety Advisor(s)

Overall Responsibility: Provide expert health and safety advice and support to Dulwich College, helping to ensure the College's health and safety practices are in line with current regulations and best practices.

Duties:

- Provide expert advice on complex health and safety matters, helping to ensure the College's compliance with legal and regulatory requirements.
- Stay updated on new health and safety legislation and best practices, advising the College on necessary changes and implementations.
- Collaborate with the College's health and safety committee, COO, and other key personnel to ensure a cohesive and comprehensive approach to health and safety.
- Assist in the development and updating of the College's health and safety policies and procedures.
- Assist in investigating and analysing health and safety incidents, and recommend corrective actions to prevent recurrence.
- Conduct regular audits and assessments of the College's health and safety systems and procedures, offering recommendations for improvements.
- Offer training and educational sessions to staff on various health and safety topics, tailored to the specific needs of the College.
- Provide guidance on risk assessment and management, helping to identify potential hazards and suggest effective control measures.
- The specific terms and nature of engagement with the College to be detailed in a separate contractual agreement, allowing flexibility and adaptability in the scope of services provided.

Health and Safety Committee

The COO will chair the meetings of the Health and Safety Committee which will meet termly. The members are listed separately to this document.

The purposes of the Committee are to consult with employees on matters concerning health and safety; to discuss any significant accidents, incidents, cases of ill health, or defects including 'RIDDOR' reports; to monitor progress on recommendations from an authoritative source; to monitor the effective implementation of the health and safety policy and annually update the contents of the safety policy.

Recommendations for the agenda include:

- Minutes of last meeting.
- Matters arising.
- Accidents/incidents/ill health/serious defects since last meeting.
- Matters raised by employees/others.
- Policy compliance, recommendations of consultants/others – progress report.
- Risk assessments update.
- Training update.
- Any other business.
- Date of next meeting.

Detailed minutes must be kept, and a set of minutes must be shared with committee members and the organisation following completion.



Mr Robert Milne
Master 25 September 2025



Endorsed by: Dr Adrian Carr
Chair of Governors 25 September 2025

Arrangements Matrix

**A light blue box denotes specific departmental risk. Where highlighted, Heads of Department and Line Managers will be required to actively managing the risk associated with the hazard topic. General arrangements for each hazard topic are defined within this policy, and supported by practical resources and management system templates, which can be found on the DC Health & Safety Intranet "H&S Resources" menu.*

Low Risk Departments

Low Risk Departments	Accidents, Incidents and Near Misses	Asbestos	Behaviour Based Safety	Competence	Confined Spaces	Construction Design Management (as "Client")	Communicable Diseases	Consulting and Communicating with Employees	Dangerous and Explosive Atmospheres (DSEAR)	Display Screen Equipment	Driving	Drugs and Alcohol	Electrical Equipment and Installations	Fire Safety	Fatigue Management	First Aid	Food Safety	Hand Arm Vibration	Hazardous Substances	Home & Flexi Working	Ionising Radiation	Lasers	Lead	Lifting Operations and Lifting Equipment	Lone Working	Managing Contractors	Managing Risk	Manual Handling	Mental Health and Wellbeing	Monitoring	New and Expectant Mothers	Noise	Occupational Health Risks	Permits to Work	Personal Protective Equipment (PPE)	Pressure Systems	Provision and Use of Work Equipment	Roof Work	Safe Systems of Work	Safety Signs, Signals and Notices	Statutory Examinations	Stress	Terrorism (Protection of Premises)	Training and Information	Travel - UK and International	Violence and Aggression	Visiting & Working in Other Employers' Environments	Visitors	Waste Management	Water Management	Work at Height	Working Time	Workplace Facilities	Workplace Transport	Work Affecting the Public	Young Persons
Academic Administration																																																									
Archives																																																									
Classics																																																								
Commissariat																																																							
Communications																																																								
Computer Science and Information Technology																																																								
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Marketing																																																						
Masters Office																																																					
Maths																																																						
Modern Languages																																																					
Procurement																																																					
Psychology																																																					
Reception																																																						
Registrar's Office																																																				
Religion & Theology																																																				
Spanish																																																					

High Risk Departments

High Risk Departments	Accidents, Incidents and Near Misses	Asbestos	Behaviour Based Safety	Competence	Confined Spaces	Construction Design Management (as "Client")	Communicable Diseases	Consulting and Communicating with Employees	Dangerous and Explosive Atmospheres (DSEAR)	Display Screen Equipment	Driving	Drugs and Alcohol	Electrical Equipment and Installations	Fire Safety	Fatigue Management	First Aid	Food Safety	Hand Arm Vibration	Hazardous Substances	Home & Flexi Working	Ionising Radiation	Lasers	Lead	Lifting Operations and Lifting Equipment	Lone Working	Managing Contractors	Managing Risk	Manual Handling	Mental Health and Wellbeing	Monitoring	New and Expectant Mothers	Noise	Occupational Health Risks	Permits to Work	Personal Protective Equipment (PPE)	Pressure Systems	Provision and Use of Work Equipment	Roof Work	Safe Systems of Work	Safety Signs, Signals and Notices	Statutory Examinations	Stress	Terrorism (Protection of Premises)	Training and Information	Travel - UK and International	Violence and Aggression	Visiting & Working in Other Employers' Environments	Visitors	Waste Management	Water Management	Work at Height	Working Time	Workplace Facilities	Workplace Transport	Work Affecting the Public	Young Persons
Art																																																									
Biology																																																									
Boarding Houses																																																								
Catering																																																								
CCF																																																								
Chemistry																																																								
Cleaning																																																								
Design & Technology																																																								
Duke of Edinbrough																																																								
Drama																																																								
DUCKS																																																								
Events																																																								
Extra-Curricular/Offsite																																																								
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Glyntawe Centre																																																								
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Projects																																																								
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Sports (PE)																																																								
Sports Centre																																																								
Theatre																																																								
Transport																																																								

Arrangements

Accidents, Incidents and Near Misses

We recognise the requirements of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR). We are committed to complying with this legislation and will:

- keep records of work-related accidents, incidents and near misses;
- investigate where necessary all work related accidents, incidents and near misses; and
- report under RIDDOR in case of reportable types of injuries, over seven-day injuries to workers, injuries to non-workers, occupational diseases, dangerous occurrences, and reportable gas incidents.

Asbestos

We recognise the requirements of the Control of Asbestos Regulations 2012. We are committed to complying with this legislation and will:

- risk assess, and survey buildings where required for asbestos, pre-2000 build year;
- identify whether asbestos is present, and determine its type and condition before managing the asbestos or starting work in a building that might contain asbestos;
- for refurbishment and demolition works complete a risk assessment to determine whether it is possible to carry out the building or maintenance work avoiding the risk of asbestos exposure all together, if this is not possible appropriate controls will be identified and implemented such as a refurbishment and demolition survey, removal, or encapsulation;
- where asbestos is to be removed, identify whether a licenced contractor is required for its removal (if the work is not licensable, decide if the work needs to be notified); and
- ensure that anyone who could be exposed to asbestos fibres at work are suitably trained.

Competence

We recognise the requirements of the Health and Safety at Work etc. Act 1974 and The Management of Health and Safety at Work Regulations 1999. We are committed to complying with this legislation and will:

- take account of the competence of relevant employees and contractors as part of the risk assessment process and training plan;
- consider all the factors of competence such as training, skills, experience, knowledge, attitude, and ability as part of the risk assessment;
- only appoint competent contractors to carry out works on our behalf;
- appoint a competent person to help meet health and safety duties.

Confined Spaces

We recognise the requirements of the Confined Spaces Regulations 1997. We are committed to complying with this legislation and will:

- carry out a risk assessment to identify hazards including presence of poisonous or flammable gas, or lack of oxygen supply. Suitable control measures will be identified and implemented to manage the risks of working in confined spaces;
- provide information and training to all employees who are required to work in confined spaces as part of their job role;
- provide suitable PPE for carrying out this work, and make sure that employees are trained in how to use it correctly, and make sure it is worn.

Construction Design Management (as "Client")

We recognise the requirements of the Construction Design Management Regulations 2015. We are committed to complying with this legislation and will:

- appoint an advisor to aid with Construction Design Management where required;
- identify when Construction Design Management Regulations apply to our activities;
- identify the duty holders to be involved, including where duties apply to us if undertaking one of the duty holders' positions;

For all construction projects:

- ensure that workers with the right skills, knowledge, training, and experience are engaged;
- ensure Contractors provide appropriate supervision, instruction, and supervision;
- ensure a written construction phase plan is produced.

For projects where more than one contractor is involved, all of the above, and:

- ensure that a Principal Designer and Principal Contractor must be appointed;
- ensure that a Health and Safety File is produced.
- if work is scheduled to last longer than 30 working days and have more than 20 workers working simultaneously at any point in the project, or exceeds 500 persons days, the HSE will be notified of the project.

Communicable Diseases

We recognise the requirements of the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1998, and are committed to complying with this legislation. In order to keep abreast of existing, emerging, or developing communicable diseases, including, but not limited to Influenza, Chicken Pox, Measles, Covid-19, H1N1 Swine Flu, Avian Flu, etc. we will:

- carry out suitable and sufficient risk assessment of the risks presented by communicable diseases which could impact on employees, with particular regard to any identified vulnerable persons

- consult with employees regarding the health risks arising from their work and interactions, in relation to completing risk assessments and deciding on the type of information and training is required to be shared with employees
- ensure control measures from the risk assessment are implemented
- inform employees and others of the risks associated with communicable diseases in relation to their work and provide information and training on the hazards and associated controls
- obtain and stay abreast of advice and information from reliable UK governmental and internationally recognised bodies, where required
- monitor, share and review risk assessments and their effectiveness on a regular basis or when the work activities or situation changes
- treat people equally in relation to openly discussing communicable diseases and the control measures in place within the workplace.

Consulting and Communicating with Employees

We recognise the requirements of the Health and Safety at Work etc. Act 1974 and Management of Health and Safety at Work Regulations 1999. We are committed to complying with this legislation and will:

- consult and communicate any proposed change which may substantially affect their health and safety at work, e.g. changing a work procedure;
- make arrangements for getting a competent person to help with compliance with regards to health and safety laws;
- consult and communicate when introducing new technology, tools or working processes;
- consult and communicate when planning health and safety training;
- inform employees of the likely risks and dangers arising from their work, measures to remove or reduce these risks and what they should do if they have to deal with a risk or danger.
- consider the use the following means of communication and maintain a record of these where possible:
  - induction training;
  - specific training;
  - safety talks and briefings;
  - MyDulwich Intranet;
  - safe systems of work;
  - face to face meetings;
  - team meetings;
  - telephone and email.

Dangerous Substances and Explosive Atmospheres

We recognise the requirements of the Health and Safety at Work etc. Act 1974 and the Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR). We are committed to complying with this legislation and will:

- Carry out a risk assessment to identify and evaluate the risks associated with dangerous substances and explosive atmospheres;
- Implement control measures to eliminate or reduce risks of fire and explosion as far as is reasonably practicable;
- Prepare plans and procedures to deal with accidents, incidents, and emergencies involving dangerous substances;
- Provide information, instruction, and training to employees on the risks associated with dangerous substances and how to control or deal with these risks;
- Identify and classify areas of the workplace where explosive atmospheres may occur and ensure appropriate measures are in place to avoid ignition sources in these areas;
- Consult with management and employees to share information on how risks will be managed and how incidents will be handled, including disciplinary procedures and reporting to the authorities if necessary.

Display Screen Equipment

We recognise the requirements of the Health and Safety (Display Screen Equipment) Regulations 1992. We are committed to complying with this legislation and will:

- identify employees to whom the Health and Safety (Display Screen Equipment) Regulations 1992 apply;
- analyse workstations to assess and reduce risks, either by self-assessment, or by arranging for a competent person to carry out a risk assessment;
- make sure controls are in place and that records are kept of assessment and actions taken;
- inform and consult with employees about the risk associated with DSE work, and provide information and training on working safely and comfortably;
- provide eye and eyesight tests on request, and special spectacles (subsidised) if needed;
- review the assessment when the user, their work, or the DSE changes.

Driving

We recognise the requirements of the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999. We are committed to complying with this legislation and will:

- carry out a risk assessment of the risks to health and safety of employees who drive as part of their work activities, and in order to assess the risks to others as a result of this activity. Ensure that this risk assessment is regularly reviewed;

- consult with employees regarding the risks arising from their work, proposals to manage these risks and provision of training and information;
- ensure that all employees who are required to drive as part of their duties have a valid driving licence;
- ensure that all employees who are required to drive as part of their duties are medically fit to undertake this work, and are capable and competent to do so;
- ensure that vehicles provided by us are regularly maintained and are roadworthy in compliance with road traffic legislation;
- make sure that routes are planned, and work schedules are realistic and allow for breaks for drivers;
- ensure that the appropriate insurance is in place and maintained.

Drugs and Alcohol

We recognise our duties under the Health and Safety at Work etc Act 1974 to ensure, as far as is reasonably practicable, the health, safety, and welfare of its employees. We also have a duty under the Management of Health and Safety at Work Regulations 1999 to assess the risks to the health and safety of its employees.

We understand that if it were to allow any employee to continue working while under the influence of excess alcohol and this places the employee or others at risk, we could be prosecuted. Similarly, if we knowingly allow an employee under the influence of drug misuse to continue working and the resulting behaviour of that employee placed either him/herself or others at risk, we could be prosecuted.

We will:

- publish the rules and restrictions on the use of alcohol and drugs use and include this information as part of induction training;
- provide information to employees about their health and use of drugs and alcohol;
- provide training to Managers and employees about how to identify the behaviours that might indicate a problem resulting from drug or alcohol misuse and how to deal with these;
- offer confidential support to any employee who may be concerned about their use of alcohol and drugs and the effect this may have on them at work;
- consult with management and employees and share information on how any cases of misuse at work will be dealt with, involving disciplinary procedures and, in the case of law-breaking, reporting to the Police.

Electrical Equipment and Installations

We recognise the requirements of the Electricity at Work Regulations 1989. We are committed to complying with this legislation and will:

- carry out a risk assessment to cover all those using or working with electricity in the course of our work;
- ensure that employees working on, or with, electrical equipment or systems are competent for the task and have suitable training, skill, and knowledge;

- ensure that the electrical installations in the workplace are safe, having been installed to an acceptable standard, and are maintained in a safe condition;
- provide safe and suitable equipment, seeking alternatives to electrical equipment if the working environment and conditions render working with electrical equipment unsafe or high risk, and providing a safety device (RCD) where electricity continues to be used;
- maintain all electrical equipment, at a suitable frequency dependent upon the type of use the equipment has;
- replace or repair all equipment that is reported as damaged or not working properly;
- provide information to employees on what portable appliances are and how they should be checked prior to use.
- ensure temporary electrics are certified and re inspected every 3 months.

Fire Safety

We recognise the requirements of the Regulatory Reform (Fire Safety) Order 2005. We are committed to complying with this legislation and will:

- ensure a responsible person is identified and given the resources to fulfil the requirements of current fire legislation;
- carry out a fire safety risk assessment to identify the risks to employees and those affected by its work activities;
- ensure that adequate and appropriate fire safety measures are in place to minimise the risk of injury or loss of life in the event of a fire;
- provide training to staff about the fire escape routes and exits available in case of emergency, and carry out regular fire drills;
- provide training and information to employees on how to reduce the risks of fire in the workplace and how these can be managed, for example by good housekeeping and ensuring that they use work equipment safely and appropriately, and refresh this training regularly, at least annually;
- install suitable fire detection equipment to premises as appropriate and make sure that this is maintained regularly;
- install the correct fire-fighting equipment for premises and make sure that this is clearly identified with signage and maintained regularly;
- carry out regular checks and inspections to ensure that fire escape routes and fire exits remain clear and unobstructed;
- review the fire risk assessment annually or more often if there are changes in the workplace.

Fatigue Management

We recognise that fatigue affects a person's health and wellbeing, increases the chance of illness and workplace injuries occurring, and reduces performance and productivity within the workplace. Appling to all employees, contractors, and visitors whilst at the workplace or whilst carrying out activities on behalf of the business, including but not limited to:

- Workers who undertake significant driving as part of their roles;
- Workers who undertake significant travel as part of their roles;
- Workers who work at client's premises and other sites.

We will strive to identify possible causes of fatigue, taking into account that factors can be interrelated, including:

- long hours at work;
- concentrating for long periods of time without breaks;
- excessive travel or extended periods of driving;
- possible personal issues e.g. family responsibilities or health problems.

We believe that there needs to be a flexible risk management approach, rather than a prescriptive approach to managing fatigue as each person's health, lifestyle, job role and approach to work is different.

First Aid

We recognise the requirements of the Health and Safety (First Aid) Regulations 1981. We are committed to complying with this legislation and will:

- provide adequate and appropriate equipment, facilities, and personnel to ensure that their employees receive immediate attention if they are injured or taken ill at work;
- carry out an assessment of first aid needs appropriate to the hazards and risks of the workplace(s) and the workforce;
- where first aiders are provided, we will ensure that they have undertaken suitable training and have an appropriate first aid qualification, and that they remain competent to perform their role;
- inform employees of the arrangements that have been made in connection with the provision of first aid, to include the location of equipment, facilities, and personnel.

Food Safety

We recognise the requirements of the Health and Safety at Work etc. Act 1974, the Food Standards Act 1999, and the Food Safety Act 1990. We are committed to complying with this legislation and will:

- consult with employees and the medical centre regarding who could be affected with regards food allergies and intolerances;
- provide food allergy information with any food supplied by the organisation;

- carry out a risk assessment for work with food;
- maintain equipment in line with statutory requirements and manufacturers guidelines;
- train relevant staff in food safety and hygiene.

Hand Arm Vibration

We recognise the requirements of the Control of Vibration at Work Regulations 2005. We are committed to complying with this legislation and will:

- provide information and training to employees so that they know what the risks are from hand arm vibration on site, and what they need to do to avoid those risks;
- carry out a risk assessment to identify and assess the risks to employees from prolonged use of vibrating tools;
- select suitable work methods and plant in order to reduce the exposure to hand-arm vibration as much as possible;
- use reduced-vibration tools whenever possible;
- make sure that vibrating tools are properly maintained and that records of maintenance are kept;
- arrange health surveillance as identified through the risk assessment process.

Hazardous Substances

We recognise the requirements of the Control of Substances Hazardous to Health Regulations 2002.

We are committed to complying with this legislation and will prevent or reduce the exposure of its employees and others to hazardous substances by:

- identifying all substances or products in use by us during its work processes which are classified as hazardous;
- carrying out a risk assessment of each of those substances or products;
- identifying and implementing control measures in order to reduce the risks to employees and others as a result of using those substances or products;
- considering alternative, less hazardous substances, or products if their use cannot be eliminated altogether;
- making sure that those control measures are used during the work processes by implementing regular checks and monitoring;
- providing information and training for employees on the safe use of the substances or products that remain in use after risk assessment has taken place;
- offering health surveillance to those employees who use substances and products which are identified as being harmful to health;
- putting into place an Emergency Plan in the event of any incident involving hazardous substances, including illness, accident, spillage, or combustion, and making sure that employees are trained to this Plan.

Home & Flexible Working

We recognise the requirements of the Health and Safety at Work etc. Act 1974, the Management of Health and Safety at Work Regulations 1999. We are committed to complying with this legislation and will:

- carry out a risk assessment of the work activities undertaken by homeworkers;
- address any remedial actions which arise from the risk assessment;
- make sure that homeworkers have suitable working conditions at home, and that, if any equipment is supplied by us, this is checked regularly and maintained in good condition;
- provide any personal protective equipment (PPE) if this is needed;
- ensure that homeworkers have regular contact with their manager and are included in all communications and training as appropriate.

Ionising Radiation

We recognise the requirements of the Health and Safety at Work etc. Act 1974, the Management of Health and Safety at Work 1999, the Ionising Radiations Regulations 2017. We are committed to complying with this legislation and will ensure that we:

- assess and review our ionising and non-ionising sources of radiation;
- carry out radiation risk assessments are, and work with a qualified radiation protection advisor (RPA) to develop a Safe System of Work (SSoW) for all tasks involving ionising radiation;
- consult with employees who are exposed to radiation to ensure that all potential risks and hazards are thoroughly identified and mitigated;
- ensure that Safe Systems of Work are established prior to the commencement of any work involving radiation and that detailed procedures for safely conducting each task, considering the identified risks, control measures, necessary equipment, working environment, emergency protocols, and the competencies required of employees are undertaken;
- provide comprehensive training for all employees on the Safe Systems of Work, ensuring they acknowledge their understanding and commitment to follow the outlined procedures.

Lead

We recognise the requirements of the Health and Safety at Work etc. Act 1974 and the Control of Lead at Work Regulations 2002. We are committed to complying with this legislation and will:

- Carry out a risk assessment to identify and evaluate the risks associated with lead exposure;
- Implement control measures to reduce lead exposure as far as is reasonably practicable, including safe work practices and engineering controls;
- Provide approved respirators and protective clothing to employees working with lead;
- Ensure regular monitoring of lead levels in the workplace and conduct exposure assessments as and where required;
- Provide information, instruction, and training to employees on the risks associated with lead and how to control or deal with these risks;

- Provide access to facilities for handwashing and showers to reduce lead contamination and ensure employees use them regularly;
- Consult with management and employees to share information on how risks will be managed and how incidents will be handled.

Lifting Operations and Lifting Equipment

We recognise the requirements of the Lifting Operations and Lifting Equipment Regulations 1998 (LOLER).

Lifting Equipment includes any equipment used at work for lifting or lowering loads including attachments used for anchoring, fixing, or supporting it. The LOLER Regulations cover a range of equipment including cranes, forklift trucks, lifts, hoists, mobile elevating work platforms, and vehicle inspection platform hoists, and accessories such as chains, slings, and eyebolts.

We are committed to complying with this legislation and will:

- carry out a risk assessment of all lifting tasks to identify hazards and measures which can be taken to eliminate or reduce the risks to employees from these tasks;
- ensure that all lifting equipment is sufficiently strong, stable, and suitable for the proposed use, and that it has been installed properly;
- ensure that the load and anything attached to are suitable;
- ensure that all lifting equipment is positioned or installed to prevent risk of injury, either from the equipment, or the load falling or striking people;
- ensure that all lifting equipment is visibly marked with appropriate safety information, for example safe working loads, and that all accessories are marked in the same way;
- ensure that all lifting operations are planned, supervised, and carried out in a safe manner by competent persons;
- ensure that equipment used for lifting people is marked accordingly and is fit for purpose;
- make sure that all lifting equipment is thoroughly examined before use for the first time, and at regular intervals of either six months (accessories and equipment used for lifting people) or annually (all other equipment) by a competent person;
- carry out any repairs or maintenance as determined by the thorough examination report, engaging a competent person to do this work;
- provide training for all users of lifting equipment to ensure that they are competent to operate it safely, and refresh this training at appropriate intervals, at least annually or in accordance with licensing requirements;
- implement a system of pre-use checks for all equipment to be completed by the operator to ensure that there are no obvious defects prior to starting work;
- operate a reporting procedure for employees to report problems or defects while working on machinery.

Lone Working

We recognise the requirements of the Health and Safety at Work etc. Act 1974, and the Management of Health and Safety at Work Regulations 1999. We are committed to complying with this legislation and will:

- carry out a risk assessment to consider potential risks of lone working and the measures needed to control the risks, and make a record of the results;
- ensure that risks are removed where possible, or if not possible, will put in place measures to control the risks to make sure that lone workers can carry out their tasks safely;
- consult with employees, and any safety representatives;
- provide training, instruction, and supervision on the tasks to be carried out, any equipment to be used, and emergency procedures;
- ensure that lone workers have access to first aid facilities, or are provided with first aid kits and training;
- provide supervision and monitoring to ensure that the lone worker is continuing to work safely and has the correct equipment and protective personal equipment (PPE) as necessary;
- put into place suitable and effective methods of communication to ensure that the lone worker can be accounted for and communicate with his or her manager in an emergency, or to obtain help if needed;
- review the risk assessment at least annually, or more frequently if tasks or working conditions change.

Managing Contractors

We recognise the requirements of the Health and Safety at Work etc. Act 1974, Management of Health and Safety at Work Regulations and Construction Design Management Regulations 2015. We are committed to complying with this legislation and will:

- assess skills, knowledge, experience, training, and organisational capability of contractors prior to engagement;
- maintain an approved contractors list or maintain a system for assessing the competence of contractors;
- engage competent contractors;
- communicate to contractors the importance of health and safety;
- provide clarity on the work required and the standards expected;
- risk assess the work with the contractor and obtain method statement and safe systems of work as deemed necessary;
- ensure short cuts are not taken;
- allocate sufficient time and resources for the work;
- be prepared to stop work if not safe;
- engage directly with contractors when addressing health and safety, both positive and negative;
- monitor contractors' performance;

- obtain contractor health and safety plans and hold a pre-start meeting to enable co-ordination and communication before and during the work;
- communicate relevant emergency procedures with the contractor;
- communicate risks to all staff and others that could be affected by contractor works.

Managing Risk

We recognise the requirements of the Health and Safety at Work etc. Act 1974 and Management of Health and Safety at Work Regulations. We are committed to complying with this legislation and will:

- make suitable and sufficient risk assessments of the risks that could impact on employees and those persons not employed but who could be affected by its undertakings;
- ensure the five steps of risk assessment are followed;
- ensure control measures are implemented;
- inform employees and others of the risks associated with their work and provide information and training on the hazards and controls;
- ensure only competent persons perform risk assessments;
- obtain advice from competent persons where required;
- monitor and review the effectiveness of risk assessments;
- review risk assessments on a regular basis or when the activity, situation, equipment, or premises changes.

Manual Handling

We recognise the requirements of the Manual Handling Operations Regulations 1992. We are committed to complying with this legislation and will:

- avoid hazardous manual handling operations so far as is reasonably practicable.
- make a suitable and sufficient assessment of the risk of injury from any hazardous manual handling operations that cannot be avoided using the HSE TILE methodology (Task, Individual, Load, Environment);
- reduce the risk of injury from those operations as far as is reasonably practicable;
- consult with their employees and provide suitable and sufficient training and supervision in manual handling;
- review risk assessments regularly or when tasks change.

Employees also have duties under these Regulations, and we will ensure that employees commit to:

- follow systems of work in place for their safety;
- use equipment provided for their safety properly;
- co-operate with their employer on health and safety matters;
- inform their employer if they identify hazardous manual handling activities;
- take care to make sure they do not put others at risk.

Mental Health & Wellbeing

Mental Health as defined by the World Health Organisation (WHO) a state of well-being in which the individual realises his or her abilities, can cope with the normal stresses of life, can work productively and fruitfully and is able to make a contribution to his or her community. We recognise the requirements of the Health and Safety at Work etc. Act 1974, and the Management of Health and Safety at Work Regulations to support employees with their mental health.

We are committed to complying with this legislation and will:

- We will risk assess and control, where possible, workplace factors that may have a negative effect on an employee's mental health and wellbeing;
- train managers and supervisors to be able to recognise the signs of mental health conditions in employees, and to act appropriately;
- regularly raise awareness of mental health to all employees at suitable intervals;
- support employees to raise any issues in the workplace that may be impacting on their mental health;
- support employees who may have developed poor mental health and make reasonable work-related adjustments;
- provide appropriate support when employees are identified as having poor mental health;
- provide regular information to employees on mental health and wellbeing;
- reduce discrimination and stigma by increasing awareness around mental health;
- promote positive mental health in all employees;

Monitoring

We recognise the requirements of the Health and Safety at Work etc. Act 1974 and Management of Health and Safety at Work Regulations. We are committed to complying with this legislation and will:

- establish systems for the inspection and auditing of Health and Safety performance on a regular basis;
- monitor and review accident and incident near miss reports on a regular basis and implement changes where required;
- promote with all employees the positive outcomes from reporting accidents, incident and near misses;
- monitor the performance and effectiveness of Health and Safety training;
- monitor the performance and effectiveness of risk assessments and safe systems of work;
- monitor relevant legislation and the impact this will have on activity and operational areas;
- monitor and act upon any shortcomings in Health and Safety management and performance;
- actively monitor the performance of contractors.

New and Expectant Mothers

We recognise the requirements of the Management of Health and Safety at Work Regulations 1999. We are committed to complying with this legislation and will:

- carry out or review relevant risk assessments to assess the health and safety risks to a new or expectant mother, and once these are identified, to put into place measures to address and control those risks;
- review this risk assessment on a regular basis, at least once per trimester, or more often if there are changes to the workplace, or to the work carried out within the role;
- upon receipt of written notification that an employee is a new or expectant mother, we will immediately take into account any risks identified in the workplace risk assessment, and, if these risks cannot be avoided by taking necessary preventative and protective measures, then we will take the following action:
  - temporarily adjust working conditions and/or hours of work; or if that is not possible;
  - offer suitable alternative work (at the same rate of pay) if available, or if that is not feasible;
  - suspend the individual from work on paid leave for as long as necessary, to protect their health and safety and that of their child.
- provide suitable rest facilities for pregnant or breast/chest feeding workers, these being located, wherever possible, near to the toilets and affording the ability to lie down if necessary;
- provide more frequent rest breaks for pregnant workers, the timing and frequency of which will be discussed and agreed;
- hold regular discussions with the new and expectant mothers, giving the opportunity to raise concerns and address any health and safety risks or changes.

Noise

We recognise the requirements of the Control of Noise at Work Regulations 2005. We are committed to complying with this legislation and will:

- provide information and training to employees to make sure that they are aware of the risks from noise, and what they need to do to avoid those risks;
- carry out a noise risk assessment to identify and assess the level of exposure of employees at work;
- consider whether noise can be reduced by using different working methods of selecting quieter plant, including by fitting silencers to plant, breakers, and other machinery where this is possible;
- keep people not involved in the work on site away from the source of the noise wherever possible;
- provide suitable hearing protection and make sure that this is worn in noisy areas;
- mark out zones on site where hearing protection must be worn;
- arrange health surveillance for people as identified through the risk assessment process.

Occupational Health Risks

We recognise the requirements of the Management of Health and Safety at Work 1999. We are committed to complying with this legislation and will:

- Risk assess work activities and ensure that all known occupational health risks are adequately considered, including but not limited to, physical, biological, chemical, psychosocial, and ergonomic hazards.
- Implement identified control measures, for example controlling dust with on-tool extraction and/or LEV systems;
- Consult with employees and provide suitable and sufficient training on occupational health risks and controls to be in place; and
- Ensure adequate arrangements are in place for the supervision of workers.

Permits to Work

We recognise the requirements of the Health and Safety at Work etc. Act 1974, and the Management of Health and Safety at Work Regulations 1999.

We are committed to complying with this legislation and will:

- implement a Permit to Work, documented control system whereby written confirmation is obtained that specific actions have been carried out before a high-risk activity is undertaken;
- keep records which clearly show, for each worker involved:
  - issue of the Permit by a competent, authorised, person;
  - receipt of the Permit by the competent worker;
  - clearance of the Permit by the competent worker; and
  - cancellation of the Permit by the competent, authorised, person.
- make sure that the records are produced and retained.

Personal Protective Equipment (PPE)

We recognise the requirements of the Personal Protective Equipment at Work Regulations 2022 (as amended). The provision and use of Personal and Protective Equipment (PPE) is also covered by some specific legislation.

Under the Personal Protective Equipment at Work Regulations 2022 the types of duties and responsibilities on employers remain unchanged but are extended to limb (b) workers.

We are committed to complying with this legislation and will:

- consider the hazards identified in the risk assessments carried out for each type of work or task and decide whether these risks can be controlled in ways other than the use of PPE. PPE will always be a last resort;
- make sure that the right type of PPE is chosen for each task in order to afford adequate protection to employees, and recognise that different types of PPE may be required for each job or task;

- make sure that where more than one item of PPE needs to be worn at a time, the items are compatible with each other, for example eye protection worn with a respirator;
- consider whether the use of PPE will increase the overall level of risk or add any new risks, for example face masks making communication more difficult.
- choose good quality PPE products which are CE marked, as required by the Personal Protective Equipment at Work Regulations 1992 (as amended), and which are chosen for their suitability to each task or job;
- provide training and instruction to the wearers of PPE, making sure that they clearly understand why they need to wear it, make sure they use it in accordance with manufacturers' instructions, and that they understand its limitations;
- replace PPE items when they become worn or damaged and are no longer fit for purpose;
- provide storage for employees to keep their PPE when it is not in use.

Pressure Systems

We recognise the requirements of the Pressure Equipment Regulations 1999 and the Pressure Systems Safety Regulations 2000.

We are committed to complying with this legislation and will:

- provide safe and suitable equipment ensuring that it is suitable for its intended use and that it is correctly installed by a competent person;
- ensure that the pressure system has been made of suitable materials for the liquids or gases that will be contained;
- ensure that a Safe System of Work is produced for use and maintenance of the pressure system, and make sure that appropriate staff are trained accordingly;
- ensure that there is a set of operating instructions for all the equipment and for the control of the whole system including emergencies;
- ensure that employees who will be using the equipment have access to the instructions for safe use and have been trained and are competent before being allowed access to the equipment. New employees, after initial training will be closely supervised;
- ensure that suitable protective devices have been fitted to the pressure vessels or pipework and that these have been adjusted to the correct settings, and are kept in good working order at all times, and cannot be altered other than by an authorised person;
- make sure that any warning devices fitted are able to be clearly seen or heard, as appropriate;
- ensure that all pressure equipment and systems are properly maintained, with a maintenance programme in place for the system as a whole;
- carry out regular checks of the equipment to look for any indications of wear, corrosion, or problems with the system;
- ensure that the system has a written scheme of examination, and that the system has been examined by a competent person in accordance with the Pressure Systems Safety Regulations 2000.

Provision and Use of Work Equipment

We recognise the requirements of the Provision and Use of Work Equipment Regulations 1998 (PUWER).

We are committed to complying with this legislation and will:

- ensure that the work equipment provided by us for use by its employees whilst they are at work is suitable for use, and safe for the purpose and conditions in which it is to be used;
- ensure that the work equipment provided is maintained in a safe condition for use so that the health and safety of employees or others is not placed at risk;
- carry out inspections of the equipment to ensure that it is and continues to be safe for use. The inspections will be carried out by a competent person and a record kept;
- eliminate or control any risks created by using the work equipment by:
  - providing suitable guarding or protection devices;
  - providing system control devices such as stop buttons;
  - providing suitable Personal Protective Equipment (PPE) for users of the work equipment where these are required;
  - producing and implementing a formal Safe System of Work (SSOW)for the use of each type of equipment or task, and any maintenance or cleaning that needs to be carried out;
  - providing suitable and sufficient training, instruction, and information about the specific work equipment, and ensuring employees have the correct skills before allowing them to work with the equipment.
- ensure that an effective planned maintenance programme is established to ensure that all equipment remains safe to use and is reliable. Maintenance will be carried out by a competent person;
- implement a reporting procedure for employees to notify any problems or defects in equipment or machinery to ensure that this is taken out of use and repaired or replaced;
- provide safe working areas for the use of work equipment which protect both the user of the work equipment and others who may be affected by their work, setting up any necessary signage, barriers, or marked areas.

Roof Work

We recognise the requirements of the Management of Health and Safety at Work Regulations 1999, Construction Design Management Regulations 2015 (CDM 2015), and Work at Height Regulations 2005. We are committed to complying with this legislation and will:

- risk assess roof work and follow the hierarchy of controls for working at height;
- make sure that edge protection is in place to stop materials or people falling;
- where required, provide nets on industrial roofing works, to stop people falling from the leading edge of the roof and from partially fixed sheets;
- make sure that a competent person safely rigs any nets used;
- make sure that any fragile surfaces are identified, such as fibre cement sheets and roof lights;

- make sure that any fragile surfaces are provided with barriers, covers or working platforms to stop people falling through them;
- make sure that either people are kept away from the area below the roof work or, if this is not possible, to install additional precautions to stop debris falling onto them.

Safe Systems of Work

We recognise the requirements of the Health and Safety at Work etc. Act 1974, and the Management of Health and Safety at Work Regulations 1999.

We are committed to complying with this legislation and will:

- ensure that, following the completion of risk assessments or task analysis, a Safe System of Work is produced by a competent person for each task or type of work where deemed necessary by the assessment;
- consult with employees who undertake the tasks or work to make sure that all aspects of risk and hazards are accounted for;
- set out the Safe System of Work as a step-by-step procedure for carrying out each task safely, taking into account the risks and control measures identified in the risk assessment, equipment needed for the task, the working environment, emergencies, and the skills that are required by employees carrying out the work;
- ensure that Safe Systems of Work are in place in advance of the work;
- ensure that all employees are trained to the Safe Systems of Work, and sign to say that they have understood the document and will follow the instructions;
- ensure that suitable and sufficient supervision is in place to ensure that the Safe Systems of Work are adhered to and enforced;
- address any instances of non-conformance with the Safe Systems of Work;
- review Safe Systems of Work, and amend as necessary, should the task or type of work change.

Safety Signs, Signals and Notices

We recognise the requirements of the Health and Safety (Safety Signs and Signals) Regulations 1996.

We are committed to complying with this legislation and will:

- ensure that safety signs are provided and maintained where there is a significant risk to health and safety identified in a risk assessment that has not been removed or controlled by other methods and where a sign can further reduce the risk;
- make sure that employees receive sufficient information, instruction, and training about the meanings of safety signs and that these are clearly explained. The consequences of not following the warning or instructions given by signs will also be explained;
- make sure that safety signs are selected and effectively used to take account of any special requirements such as visual or hearing impairments, or work environment;

- ensure that the signs are regularly checked or inspected to make sure that they remain in good condition, and are legible or visible, and free of damage. Any signs which are worn or defective will be replaced or repaired.

Statutory Examinations

We recognise the requirements of the Lifting Operations and Lifting Equipment Regulations 1998 (LOLER), The Pressure Systems Safety Regulations 2000, and the Provision and Use of Work Equipment Regulations 1998.

We are committed to complying with this legislation and will:

- identify the equipment in use which, in addition to regular maintenance and inspection requires Statutory Inspections in order to comply with the Regulations above;
- ensure that Statutory Inspections are carried out by a competent person at the intervals specified for each type of equipment;
- keep a record of the equipment inspected and copies of the inspection records and certificates;
- where required, maintain written schemes of examination.

Stress

We recognise the requirements of the Health and Safety at Work etc. Act 1974, and the Management of Health and Safety at Work Regulations to protect its employees from stress at work

We are committed to complying with this legislation and will:

- carry out a risk assessment to identify the risks of stress to employees;
- train managers and supervisors to be able to recognise the signs of stress in employees, and to take action;
- talk to employees about the potential causes of stress for them while they are at work, and encourage them to approach their managers if they feel they are not coping;
- regularly review the issue of stress at work by including this on agendas for relevant meetings.

Terrorism (Protection of Premises) Enhanced Duty

We recognise the application and requirements of the Terrorism (Protection of Premises) Act 2025, and are committed to complying with this new legislation. We will ensure that:

- the appropriate qualifying public premises registration is made with the enforcing authority (Regulator);
- any qualifying public events organisers are notified of their requirement to register their event with the enforcing authority (Regulator) as applicable;
- put in place appropriate and reasonably practicable public protection measures;
- document the public protection procedures and measures in place, or proposed to put in place, and provide this document to the regulator;

- terrorism protection training is implemented for all employees;
- an enhanced terrorism evaluation of the premises is conducted which will be reviewed:
  - each time a material change is made to the premises or to the use of the premises, or
  - every 12 months.

We will closely monitor on-going developments surrounding this new legislation and updates to this arrangement will occur as and when required.

Training and Information

We recognise the requirements of the Health and Safety at Work etc. Act 1974 and Management of Health and Safety at Work Regulations 1999. We are committed to complying with this legislation and will:

- provide information, instruction, training, and supervision as is necessary to ensure, so far as is reasonably practicable, the health and safety at work of employees;
- provide training in the following ways:
  - induction training;
  - specific training;
  - safety talks;
  - briefing meetings.
- will provide information through these training sessions and via:
  - internal memos;
  - face to face meetings;
  - notice boards and displays;
  - health and safety signage;
  - contracts, job descriptions and role profiles;
  - risk assessments and safe systems of work.

Travel - UK and International

We recognise the requirements of the Health and Safety at Work etc. Act 1974, the Management of Health and Safety at Work Regulations 1999 and the Working Time Regulations 1998.

We are committed to complying with this legislation and will:

- ensure that, if travel for work is required, that this is necessary in the interests of the business and cannot be avoided by communicating by other means such as teleconferencing, phone, email, or correspondence;
- check Home Office guidance where travel overseas is required, to seek guidance on travel to the intended destination;
- ensure that the route of travel is planned, tickets and accommodation are booked in advance, and that sufficient time is included in the itinerary to allow the travelling employee to rest;
- make sure that any employee travelling abroad has up to date vaccinations as necessary;
- ensure that suitable and adequate travel insurance is in place;

- ensure that an individual risk assessment has been carried out to assess the suitability of the member of staff to travel, paying particular attention to the destination country or region of travel;
- put into place arrangements to keep in touch with the travelling employee, enabling them to notify their Manager or other appointed person that they are safe, and maintaining contact with us.

Violence and Aggression

We recognise the requirements of the Health and Safety at Work etc. Act 1974, the Management of Health and Safety at Work Regulations 1999 and the Health and Safety (Consultation with Employees) Regulations 1996.

We are committed to complying with this legislation and will:

- consult with employees to assess whether they feel threatened at work and the extent of this, and discuss the results with employees;
- use the findings of the consultation to carry out a risk assessment to identify the hazards of violence and aggression in the workplace, identifying those employees most at risk and situations which might give rise to violent or aggressive behaviour;
- implement a procedure for dealing with incidents and getting help;
- keep records of incidents, including verbal abuse and threats, to include: -
  - an account of what happened;
  - the location of the incident;
  - details of the victims, assailants, and any witnesses;
  - the outcome, including any working time lost to the individuals affected and to us as the employer.
- encourage employees to report incidents promptly and fully;
- provide training to employees to help them spot early signs of aggression and how to avoid or cope with it, following the procedures to get help;
- review the risk assessment regularly, or if there is any change to the work, tasks, or following an incident.

Visiting and Working in Other Employers' Environments

We recognise the requirements of the Health and Safety at Work etc. Act 1974, the Management of Health and Safety at Work Regulations 1999, and the Construction (Design Management) Regulations 2015.

We are committed to complying with this legislation and will:

- carry out a risk assessment for each job type involved in working in other employers' environments where a risk exists;
- plan visits to other employers by obtaining, in advance, details of contacts on the site, reporting arrangements on arrival, and particular safety requirements, for example, Personal Protective Equipment (PPE), or site induction training;

- consult with those employees required to visit other employers' environments, and make sure that they understand that they must follow the health and safety procedures in place at the host site;
- provide any specific PPE required prior to the visit, and make sure the visiting employee has been trained in its use;
- put into place arrangements for the employee to keep in contact, in order to report any problems or issues, and to report safe arrival and departure.

Visitors

We recognise the requirements of the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999.

We are committed to complying with this legislation and will:

- operate a signing in and out procedure for visitors who will be visiting or working on our premises;
- accompany or escort visitors during their visit as deemed necessary;
- provide basic health and safety information to visitors upon their arrival, including location of welfare facilities, fire safety and evacuation procedures, accident reporting procedures, and routes to be taken around the premises;
- ensure that, where appropriate, visitors are provided with the relevant induction training prior to starting work;
- provide any appropriate Personal Protective Equipment (high visibility vest, hard hat, safety glasses) which may be required to enable safe movement through the site or premises.

Waste Disposal

We recognise the requirements of the Waste Regulations 2012, The Separation of Waste Regulations 2025, and the Waste Electrical and Electronic Equipment Recycling (WEEE) Regulations 2006.

We are committed to complying with this legislation and will:

- avoid the production of unnecessary waste;
- identify the types of waste produced or created and assess how this will be managed;
- dispose of waste in accordance with current legislative requirements in a responsible way and maintain evidence of waste transfer notes.

Water Management (Legionella and Legionnaires)

We recognise the requirements of the Control of Substances Hazardous to Health Regulations 2002 and Notification of Cooling Towers and Evaporative Condensers Regulations 1992 (NCTEC).

We are committed to complying with this legislation and will prevent or reduce the exposure of its employees and others to Legionella and Legionnaires' disease by:

- identifying and assessing sources of risk through the risk assessments process through a competent person;
- manage the risks to ensure they are prevented or controlled;
- keeping records such as a waterlog book of measures taken to include the assessor's findings, control schemes, operation of the system, monitoring and testing of the system;
- completing notifications where required for certain systems such as cooling towers and condensers.

Work at Height

We recognise the requirements of the Work at Height Regulations 2005.

We are committed to complying with this legislation and will:

- work from ground level whenever possible;
- make sure that work at height is properly planned, supervised, and carried out by competent people;
- carry out a risk assessment for each task where working at height is involved;
- avoid work at height where it is reasonably practicable to do so;
- where work at height cannot be avoided, prevent falls using either an existing place of work that is already safe or the right type of equipment;
- minimise the distance and consequences of a fall, by using the right type of equipment where the risk cannot be eliminated;
- ensure that only staff who have been trained in working at height are permitted to carry out such tasks;
- make sure that the correct type of equipment is used for each working at height task;
- implement an emergency and rescue plan for work at height and make sure that all employees who work at height are trained to this plan;
- carry out regular inspections and checks of all equipment used for working at height and keep records of these checks;
- repair or remove from use any equipment found to be defective or unsuitable for use;
- ensure that employees do not work alone on working at height tasks.

Working Time

We recognise the requirements of the Working Time Regulations 1998.

We are committed to complying with this legislation and will:

- ensure that the maximum weekly working time limit is not exceeded;
- implement night work limits; and
- complete health assessments for night work.

Workplace Facilities

We recognise the requirements of the Workplace Health, Safety and Welfare Regulations 1992. We are committed to complying with this legislation and will ensure that every workplace under our control complies with the Workplace Health and Welfare Regulations in particular to:

- the maintenance of the workplace, equipment, devices, and systems;
- effective and suitable ventilation being provided;
- a reasonable temperature being provided in relation to the work carried out;
- suitable and sufficient lighting and emergency lighting being provided;
- a clean workplace, furniture, furnishings, and fittings to be kept and maintained with arrangements made for disposal of waste materials to avoid accumulation;
- provision of sufficient room dimensions and space in order to work safely;
- provision of suitable workstations and seating;
- provision of floors and traffic routes that are fit for purpose, well maintained and safe for use to include areas where there is a risk of a person falling shall be securely covered or fenced;
- the windows, doors, gates, and walls (transparent or translucent) being of safe material, protected against breakage of that material and be appropriately marked to make it apparent. Doors and gates will be suitably constructed to ensure their safe use and operation;
- windows, skylights, and ventilators to be in a safe position and be operationally safe including their cleaning;
- traffic and pedestrian routes to be organised in such a way that they can circulate in a safe manner;
- escalators and moving walkways functioning safely, fitted with safety devices, identifiable and accessible emergency stops;
- suitable and sufficient sanitary conveniences shall be provided and readily accessible that are ventilated, lit, clean, and securable;
- suitable and sufficient washing facilities being provided that are clean and accessible with clean, hot, and cold water, suitable cleaning materials, means of drying, ventilated, and lit;
- separate male and female facilities except where facilities are only used by one person at a time and can be secured from the inside;
- an adequate supply of wholesome drinking water being supplied, accessible and clearly marked as drinking water;

- suitable and sufficient accommodation for clothing where special clothing is worn or for clothing which is not worn during working hours as well as facilities for changing such clothing;
- provision of suitable and sufficient rest and eating facilities.

Workplace Transport

We recognise the requirements of the Health and Safety at Work etc. Act 1974, the Management of Health and Safety at Work Regulations 1999, the Provision and Use of Work Equipment Regulations 1998, the Workplace (Health, Safety and Welfare) Regulations 1992.

We are committed to complying with this legislation and will:

- carry out a risk assessment to assess risks to pedestrians and vehicles and to ensure that control measures that are in place are adequate;
- plan traffic routes to provide the safest route between places where vehicles travel, ensuring that pedestrian safety has been designed into the layout of the traffic route, and record this formally as a Traffic Management Plan;
- regularly review both the risk assessment and Traffic Management Plan to ensure that these remain current, or in the event of change, or following an incident or near miss;
- ensure that vehicles provided for workplace use are suitable for the tasks they will be used for; suitable for the environment in which they will be used; used only for suitable operations under suitable conditions; provided with horns, lights, reflectors, alarms and where appropriate, reversing aids; provided with seat belts; checked daily for basic safety; maintained in accordance with manufacturers' instructions and kept in good working order;
- ensure that the employees operating the transport are trained and competent, with training refreshed regularly; informed about site rules, including parking, speed limits, loading, unloading, securing loads, and trained to carry out basic safety checks on the vehicle; authorised to drive by having the correct class or type of licence for the vehicle concerned; actively supervised and monitored;
- ensure that a Safe System of Work for all tasks involved with Workplace Transport is in place and that all employees are trained and sign to show their understanding;
- provide protection for pedestrians by way of marked or barriered safe routes or safe areas and restriction from areas of high levels of vehicle movement;
- implement speed limits on site;
- install suitable signage to depict speed limits, traffic route directions, pedestrian routes, or safe spaces;
- ensure that workers supporting traffic movements and functions on site wear hi-visibility vests or jackets.

Work Affecting the Public

We recognise the requirements of the Management of Health and Safety at Work etc. Act 1974 and the Construction Design Management Regulations 2015 (CDM 2015). We are committed to complying with this legislation and will:

- ensure that any work is fenced off from the public;
- make sure that any roadworks are barriered off and lit, and a safe alternative route is provided;
- ensure that the public are protected from falling material;
- provide a safe route through roadworks or pavement scaffolding for people with prams, wheelchair users and visually impaired people;
- when work has stopped for the day:
  - make sure that the boundary is secure and undamaged;
  - make sure all ladders are removed or their rungs boarded so that they cannot be used;
  - make sure excavations and openings are securely covered or fenced off;
  - make sure all plant is immobilised to prevent unauthorised use;
  - make sure bricks and materials are safely stacked;
  - make sure that flammable or dangerous substances are locked away in secure storage places.

Young Persons

We recognise the requirements of the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999.

We are committed to complying with this legislation and will:

- carry out or review relevant risk assessments for all staff and workers under the age of 18 at the commencement of their employment, taking into account the tasks and work they will be undertaking.
- provide a copy of the risk assessment to the young person's parent or carer.
- provide clear and sufficient training and supervision to ensure that the young person does not put themselves or others at risk;
- make sure that young persons are treated in the same way as all other employees with access to the same facilities, training, and conditions;
- make sure that young person's know to report any health and safety concerns.