

## Health, Safety and Welfare Policy

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OR06	7	Full review of policy, re-wording and re-format of policy	Craig Morris	Nov 2017	QSGC	N/A
For details of reviews 7 to 13 please refer to control schedule at the end of this policy						
OR06	14	Point 9 Aggression and Violence has been expanded on to clarify the procedures and responsibilities.	Craig Morris	Dec 20	QSGC	N/A
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## Fair Ways Vision, Mission and Values

### Our vision

To build an institution that makes a difference to society and leaves a legacy greater than ourselves and our contributions.

### Our mission

Making a difference through passionate care, support and education.

### Our values

Our values form the heart of the work we do, defined by Fair Ways people, for Fair Ways people. These are the values by which we operate, by which we are governed, and to which we are held accountable.

We therefore expect every individual within the organisation to *play their part*:

<b>P</b> ROFESSIONAL	<b>A</b> CEPTING	<b>R</b> ELECTIVE	<b>T</b> RANSPARENT
<ul style="list-style-type: none"> <li>We do what we say we will</li> <li>We approach challenges with optimism and enthusiasm</li> <li>We don't judge, we notice</li> <li>We put the needs of the service before our own personal gains</li> </ul>	<ul style="list-style-type: none"> <li>We don't give up on people</li> <li>We value all individuals and are willing to challenge them</li> <li>We embrace each other's differences as much as our similarities</li> <li>We accept responsibility for our actions</li> </ul>	<ul style="list-style-type: none"> <li>We give feedback, we invite feedback, we listen to feedback</li> <li>We look inward before we look outward</li> <li>We learn as much from our mistakes as from our successes</li> <li>We listen to each other, learn from each other and grow together</li> </ul>	<ul style="list-style-type: none"> <li>We are always willing to explain why</li> <li>We have the courage to be open and honest</li> <li>We earn trust through our transparency</li> <li>We live by our values even when no-one is watching</li> </ul>

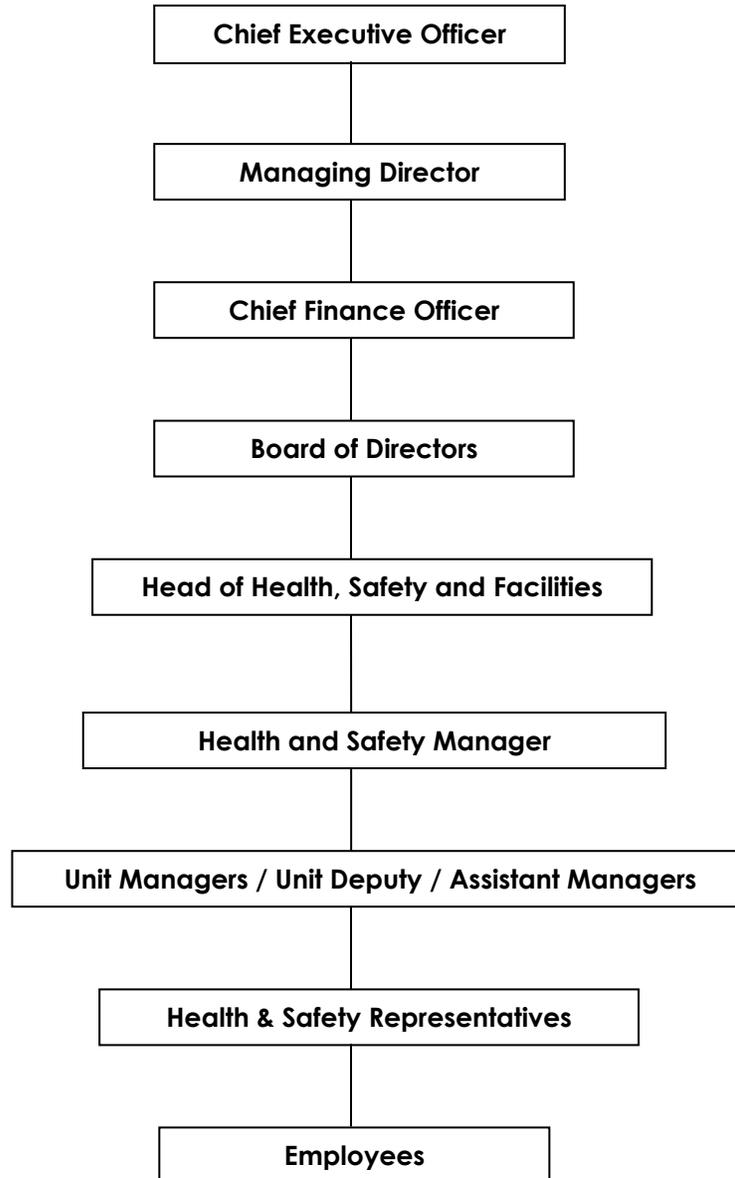
## **1 Health, Safety and Welfare Policy Statement**

- 1.1 Fair Ways (hereinafter referred to as the Organisation), believes that the prevention of accidents involving personal injury or damage to property and the welfare of its employees, children and young persons' in their care and other who may be affected by our activities is essential to the successful operation of the business, and it regards the health, safety and welfare of its employees, service users and young persons' in their care as paramount.
- 1.2 Therefore, through this statement of intent the Organisation will do all that is reasonably practicable to ensure the health, safety and welfare at work of all employees, service users and young persons' in their care and others who may be affected by its activities at all its premises by provision of the necessary organisation, training, supervision and safe equipment.
- 1.3 It is the policy of the Organisation to comply with the terms of the Health and Safety at Work Etc., Act 1974 and with subordinate health and safety regulations taking into account current Health and Safety Executive guidelines.
- 1.4 The Organisation will, so as far as is reasonably practicable, provide:
- A safe place of work, with safe means of access and egress
  - A safe working environment with safe tools, plant, equipment and safe systems of work
  - Safe use, handling, storage and transportation of articles and substances.
  - Instruction and training to staff in known safety hazards, safe systems of work and the use of any safety systems or safety equipment provided.
- 1.5 In addition the Organisation will:
- Provide an organisation structure that ensures that this Health Safety and Welfare Policy will be implemented in full and updated as appropriate.
  - Ensure there is effective communication with and co-operation of all employees in the operation of this Health Safety and Welfare Policy.
  - Assess all significant risks to its employees and others to develop and implement proactive measures aimed at eliminating those risks, or at least reducing them so far as is reasonably practicable.
  - Strive for continuous improvement through regular monitoring of this Health Safety and Welfare Policy.
  - Bring this statement to the attention of all employees and any other person who may be affected by the Organisation's undertaking.

<b>Position</b>	<b>Name</b>	<b>Signature</b>	<b>Date</b>
Chief Executive Officer	Mac McHugh		
Managing Director	Gareth Webb		
Chief Finance Officer	Vivien Sheath		
Director of Human Resources	Jane Jarvis		
Director of IT & Communication	Paul Moran		
Director of Talent & Performance	Wayne Okell		
Director of Family Services	Dan Buckle		
Director of Residential Services	Jonathan Loney		

## 2 Health and Safety Management Organisation

### 2.1 Operational Board Chart



## 2.2 Operational Board

As part of an effective health and safety management system the Operational Board of Directors need to take the lead and set the direction for effective health and safety management.

The Operational Board will need to:

- Assist the Head of Health, Safety and Facilities in ensuring this Health, Safety and Welfare Policy is implemented in full within all premises occupied by the Organisation and that its contents and philosophy are understood at all levels.
- Ensure the development of a positive health and safety culture within the Organisation.
- Ensure the Organisation's premises and safe working practices do comply with the requirements of the Health and Safety at Work etc. Act 1974 and all other relevant health, safety and welfare regulations.
- Ensure that all accidents and incidents are recorded and investigated and that any deemed reportable under RIDDOR are reported.
- Review the standards of performance of health safety and welfare in the Organisation with the Organisation's external Health and Safety Advisor and establishing any programs deemed necessary for improvement.
- Ensure the Organisation's Disciplinary Code if breaches of safe working practices occur is enforced.
- Ensure the effective communication with and co-operation of all employees in the operation of this Health Safety and Welfare Policy.
- Ensure Health and safety appears regularly on the agenda for board meetings.
- Appoint a person who is competent to meet Fair Ways health and safety duties.
- Ensure adequate resources are given to health and safety.
- Ensure adequate competent health and safety advice is obtained.
- Risk assessments are carried out.
- Ensure employees are involved in decisions that affect their health and safety.
- Ensure that appropriate weight is given to reporting both preventative information such as training and maintenance and incident data such as accidents and sickness absence.
- Ensure periodic audits on the effectiveness of management structures and risk controls for health and safety are carried out.
- Ensure that the impact of changes such as the introduction of new procedures, work processes or products, services or any major health and safety failure, is reported as soon as possible to the board.
- Ensure there are procedures to implement new and changed legal requirements and consider any external developments and events.

- Review health and safety performance at least annually. This will include examining whether the health and safety policy reflects the organisations current priorities, plans and targets; examine whether risk management and other health and safety issues have been effectively reported to the board; report health and safety shortcomings and the effect of all relevant board and management decisions; device actions to address any weaknesses and a system to monitor their implementation; consider immediate reviews in the light of any major shortcomings.

### **2.3 Health & Safety Competent Person**

The overall and final responsibility for the management of health and safety rests with **Mac McHugh, Chief Executive Officer** of Fair Ways and he is responsible for:

- Ensuring only competent people are appointed to assist the Organisation meet its statutory duties.
- Ensuring that this Health, Safety and Welfare Policy is implemented in full within all premises occupied by the Organisation and that its contents and philosophy are understood at all levels.
- Ensuring the development of a positive health and safety culture within the Organisation.
- Ensuring that adequate time and resources are allocated by the Organisation to health, safety and welfare issues.
- Ensuring the Organisation's premises and safe working practices do comply with the requirements of the Health and Safety at Work etc. Act 1974 and all other relevant health, safety and welfare regulations.
- Ensuring that all accidents and incidents are recorded and investigated and that any deemed reportable under RIDDOR are reported.
- Reviewing the standards of performance of health safety and welfare in the Organisation with the Organisation's external Health and Safety Advisor and establishing any programs deemed necessary for improvement.
- Ensuring the Organisation's Disciplinary Code is enforced if breaches of safe working practices occur.

**2.4 Head and Safety Team** are charged with the following responsibilities:

- Implementation of the requirements of this Health, Safety and Welfare Policy.
- Ensuring that appropriate health and safety standards are maintained so far as is reasonably practicable.
- Ensuring that all work equipment is maintained in a safe condition and receives regular inspection, testing and/or servicing as required by legislation or Organisation policy.
- Ensuring all employees receive adequate training to enable them carry out their duties safely.
- Ensuring the Organisation's Disciplinary Code if breaches of safe working practices occur is enforced.
- Ensuring the health and safety of contractors and visitors and that any contractor or visitor adhere to any laid down safe working practices.
- Any work equipment purchased complies with relevant standards and is accompanied by CE marking.
- Ensuring that all hazardous substances are stored correctly, only used for the correct application and that employees adhere to the safe working practices.
- Ensuring that appropriate Personal Protective Equipment (PPE) is ordered, available, used, stored and maintained in good condition.
- Ensuring that buildings and services are maintained in a safe state and any statutory requirements are fulfilled.
- Ensuring that any work at height activity is adequately assessed and supervised.

**2.5 Directors and Heads of Department**

**The Directors and Heads of Department** are charged with ensuring the Department Managers / Homes Managers and Deputy / Assistant Managers under their control fulfil their responsibilities for the day-to-day co-ordination and implementation of the Health Safety and Welfare Policy. The **Directors and Heads of Department** have the following responsibilities:

- Implementation of the requirements of this Health, Safety and Welfare Policy.
- Ensuring that appropriate health and safety standards are maintained so far as is reasonably practicable.
- Ensuring that all work equipment is maintained in a safe condition and receives regular inspection, testing and/or servicing as required by legislation or Organisation policy.
- Ensuring all employees receive adequate training to enable them carry out their duties safely.
- Undertaking yearly audits by running through at least one of the four 'Quarterly Health & Safety Self Audit Checklist' to ensure Department Managers/Homes Managers and Deputy / Assistant Managers are complying with their health and safety responsibilities and ensuring that any corrective actions or improvements are implemented.
- Ensuring the Organisation's Disciplinary Code if breaches of safe working practices occur is enforced.

**2.6 Department Managers, Homes Managers (Unit Managers), Maintenance Manager and Deputy / Assistant Managers** are charged with the day-to-day responsibility for the co-ordination and implementation of the Health, Safety and Welfare Policy. They have the following responsibilities for the premises for which they have operational responsibility:

- Implementation of the requirements of this Health, Safety and Welfare Policy.
- Ensuring that appropriate health and safety standards are maintained so far as is reasonably practicable.
- Ensuring there is adequate supervision of all employees under their control to ensure that all safe working practices are adhered to.
- Ensuring the health and safety of contractors and visitors and that any contractor or visitor adhere to any laid down safe working practices.
- Recording, investigating and reporting internally any accidents or safety related incidents involving employees or other persons and employee sickness arising from work related activities.
- Ensuring that all work equipment under their control is in a safe condition for use.

- Ensuring that only authorised hazardous substances are purchased & used within the premises.
- Ensuring that all hazardous substances are stored correctly, only used for the correct application and that employees adhere to the safe working practices.
- Ensuring that appropriate Personal Protective Equipment (PPE) is ordered, available, used, stored and maintained in good condition.
- Ensuring any designated fire doors remain closed and that fire exit routes are not blocked or used for storage.
- Ensuring that any work at height activity is adequately assessed and supervised.
- Ensuring that adequate first-aid supplies and fire precautions are maintained including any requirements for testing the equipment.
- Ensuring all new employees receive appropriate induction and ongoing training and that training records are kept up to date.
- Shall report to the Head of Health, Safety and Facilities any hazard or defect affecting health, safety or welfare that in their view is unsafe and they cannot rectify.
- Ensuring the Organisation's Disciplinary Code if breaches of safe working practices occur is enforced.

## **2.7 Health and Safety Consultant**

2.7.1 The services of an external Health and Safety Consultancy is retained to provide advice and guidance.

2.7.2 The Health and Safety Consultant is available to assist in achieving a high standard of safety performance and his responsibilities will include the following:

- Providing the Organisation with up-to-date safety information and advising on the actions required arising from Health and Safety Legislation, Approved Codes of Practice, Guidance Notes and other material issued by the Health and Safety Executive.
- Assisting the Organisation to identify hazards within the workplace that require a risk assessment in order to determine the control measures to be adopted.

- Making periodic inspections of the premises to ensure that unsafe equipment, working conditions, practices and fire hazards are identified as early as possible, thereafter reporting the results of such inspections to the Registered Manager responsible for health and safety with recommendations to remedy any defects.
- Whenever necessary, investigating the circumstances of a Major Accident defined under RIDDOR, the events leading to it, reporting on it and making recommendations to avoid a recurrence.

## **2.8 Health and safety representatives**

Health and safety representatives (H&S reps) are front line employees selected for the role, who represent the health and safety interests of their peers, colleagues and service users within their workgroup and are accountable to the service manager. Health and Safety Reps are responsible for checking all Health and Safety procedures and documentation. They have the following responsibilities for the premises they have been allocated to:

- Check the implementation of the requirements in the Health, Safety and Welfare Policy by accurately completing the Health and Safety rep checklist.
- Ensure key health and safety documentation and servicing records for equipment remain in date and are on file available for inspection.
- Ensuring that appropriate health and safety standards are maintained so far as is reasonably practicable.
- Ensuring safe working practices are adhered to and report any concerns to management.
- Ensuring that all work equipment under their control is in a safe condition for use.
- Ensuring that only authorised hazardous substances are purchased & used within the premises.
- Ensuring that all hazardous substances are stored correctly, only used for the correct application and that employees adhere to the safe working practices.
- Ensuring that appropriate Personal Protective Equipment (PPE) is ordered, available, used, stored and maintained in good condition.
- Ensuring any designated fire doors remain closed and that fire exit routes are not blocked or used for storage.
- Ensuring that adequate first-aid supplies and fire precautions are maintained including any requirements for testing the equipment.
- Shall report to the service manager any hazard or defect affecting health, safety or welfare that in their view is unsafe and they cannot rectify.
- Attend Health and Safety Committee meetings.

## **2.9 Employees**

All employees are held accountable at law not to commit acts in breach of safety legislation and they must not willfully and without reasonable cause, do anything likely to endanger themselves or others. The responsibilities of employees are:

- Familiarise themselves with the contents of the Health Safety and Welfare Policy and the arrangements for its implementation and at all times conform to them.
- Observe safety standards and procedures at all times whilst engaged on their allocated duties and conduct them in a safe manner in order that they or other persons are not put at risk.
- Shall conform to any safety instructions given by a senior member of staff.
- Shall undertake and follow relevant health, safety and welfare training provided.
- Shall report to their Line Manager or other relevant Manager (e.g. On-Call) all incidents and accidents whether it involves employees, equipment, vehicles, property or other persons and whether or not a person has been injured and will assist as necessary in the investigation of accidents or dangerous occurrences.
- Shall report to their Line Manger or other relevant Manager (e.g. On-Call) any hazard or defect affecting health, safety or welfare that in their view is unsafe.
- Assist in the maintenance of good housekeeping standards.
- Wear, use, maintain and store protective clothing and equipment (PPE) in accordance with the information, instruction and training provided.
- Not use equipment or tools for which they have not been authorised.
- Not to bring any personal items of electrical equipment onto the premises other than battery operated items unless it has been inspected and tested by a competent person (PAT testing).
- Use, handle and store hazardous substances in the prescribed manner and in accordance with the information, instruction and training provided.
- To co-operate in order that any legal requirement or obligation imposed by health and safety legislation may be complied with and to properly use the facilities and equipment provided for your health, safety and welfare and not to intentionally or recklessly interfere with them.

### **3 Planning and the Management of Health, Safety and Welfare**

- 3.1 The management of the health and safety risk arising out of our work activities will be based upon **risk assessment**.
- 3.2 The findings of individual risk assessments will be recorded by the Unit Manager. The Operational Board / The Health and Safety Team are responsible for ensuring the control measures necessary to remove or reduce risks to health or safety are fully implemented.
- 3.3 Risk assessments are to be reviewed annually or whenever the conditions of work, work activities or other relevant circumstances change.
- 3.4 Risk control systems and workplace conditions will be continuously monitored by the Unit Manager and the Deputy / Assistant Managers who are responsible for ensuring any hazards, defects or other matters of concern are rectified.
- 3.5 In addition health and safety inspections of the workplace will be undertaken by the Health and Safety Advisor at agreed intervals.
- 3.6 Any defects or matters of concern arising out of the Health and Safety Representatives' workplace inspections will be reported to the Relevant Manager responsible immediately for appropriate corrective action to be taken and within a written report to the Directors/The Head of Health Safety and Facilities.
- 3.7 The Health, Safety and Welfare Policy will be reviewed by the Directors and Health and Safety Manager annually or whenever there is a substantial change in the workplace or work activities.
- 3.8 The Directors/the Head of Health Safety and Facilities, will review the management arrangements and risk control systems and establish priorities for any necessary remedial measures that may from time to time be identified through the processes of monitoring and review.
- 3.9 ***Refer to the Separate Policy on Risk reporting (Doc Ref OR40) for information regarding the Risk reporting process.***

### **4 Consultation with Employees**

- 4.1 The Organisation will consult with employees on matters that affect their health and safety at work. This includes the introduction of anything that may substantially affect health and safety; risks identified through risk assessment and the measures

taken to reduce those risks; the health and safety implications of any new technology introduced into the workplace and the planning and organising of health and safety training.

- 4.2 Consultation will be undertaken through briefing meetings / one to ones or other suitable means that will be arranged from time to time as required.

## **5 Information, Instruction and Training**

- 5.1 Comprehensible and relevant information will be provided on risks to health or safety identified through risk assessments and the preventative and protective measures taken to control them. The Health and Safety Law poster is displayed on the notice board at every premise.

- 5.2 Induction training for new employees and temporary workers will be undertaken and in particular new starters and temporary workers are made aware of:

- What to do in an emergency situation - fire for example;
- Where and from whom they may obtain first-aid assistance;
- The risks assessments and the control measures in place; and
- Where to go and who to ask for advice and assistance generally.

- 5.3 The training needs of all employees will be assessed against all identified work activities and suitable training will be undertaken internally or provided by external training providers.

- 5.4 The Organisation will maintain training records and will arrange refresher training where required by legislation or otherwise determined by monitoring employees actions. All training will be recorded and will be signed for by each employee.

## **6 Emergency Procedures in the Event of a Fire**

- 6.1 The Organisation's primary concern is the safety of all our employees, service users and other persons however the preservation of property is complementary and we recognise that our business can be diminished or seriously impaired following loss or damage to property.

- 6.2 The Organisation recognises the primary tool in this process is the completion of a fire risk assessment which will be undertaken by a competent person.

- 6.3 The Organisation will endeavour to comply with the general requirements of good fire protection. This includes the provision of a suitable means of raising the alarm, suitable fire exit routes and appropriate signage.

6.4 All fire equipment will be maintained by competent contractors and all fire alarms and emergency lights will be tested weekly by the H&S Representative or a competent employee and recorded.

6.5 The Organisation will ensure all employees receive appropriate fire training and that regular evacuation drills are undertaken and recorded.

6.6 The Unit Managers and Deputy / Assistant Managers will ensure smoking is adequately controlled at a designated external point.

**6.7 *A separate Fire safety Policy (OR04) has been produced by the Organisation and reference should be made to this.***

**6.8 General Procedures in the Event of a Fire**

Any person discovering a fire should:

- Immediately raise the alarm by activating one of the call points or by shouting fire.
- Ensure that the Fire Brigade is called immediately by dialing 999 and give the full postal address of the premises.
- Direct anybody in the area away from the fire and towards the nearest available fire exit.

On hearing the alarm, everyone is to evacuate by the nearest available fire exit.  
In exiting:-

- Do not - delay your evacuation to collect coats or personal belongings.
- Please - close doors any behind you as you leave the building.

Only attempt to fight the fire with a fire extinguisher if:-

- You have raised the alarm first.
- You have received training and are certain you know you have selected the correct type of extinguisher and you know how to use it.
- The fire is small and you can tackle it safely without risk to yourself or others.
- Your exit route is within easy reach and not in danger of becoming engulfed by the fire.

6.9 After evacuation, all persons are required to assemble at the designated assembly points notified during induction. No one is to re-enter any building until the fire brigade say it is safe to do so.

- 6.10 Contractors and Visitors – All employees are responsible to ensure that any contractor or visitor is aware of these procedures and ensure they evacuate when the fire alarm sounds.

## **7 Contractors and Visitors**

- 7.1 All visitors and contractors are required to sign in and out at reception / office as appropriate to the site.
- 7.2 All visitors and contractors are to be accompanied whilst on the premises or directed as appropriate by a responsible employee.
- 7.3 All visitors and contractors are to be provided with appropriate information about hazards they may encounter whilst on the premises and the emergency procedures in the event of a fire or accident.
- 7.4 All visitors and contractors are not allowed to bring any equipment, plant or tools onto the premises without appropriate evidence of its safety e.g. PAT testing of electrical equipment, statutory inspection documentation covering lifting equipment etc.
- 7.5 All visitors and contractors are not allowed to use any Organisation equipment.
- 7.6 All accidents and incidents are to be reported to the person responsible for them.
- 7.7 Contractors will not be allowed to commence work other than emergency repairs without first having provided risk assessments and/or safe systems of work. If contractors are to undertake any hazardous activities, including work involving the application of heat, on electrical systems, at height or in a confined space their operations are to be subject to a Permit to Work.
- 7.8 The procedures and precautions to be observed by the contractors are to be approved in advance by the Head of Health, Safety and Facilities who are responsible for authorising all proposed contractors' operations.
- 7.9 All contractors' employees are required to follow the Safe Systems of Work covering the activities they are contracted to undertake including the use of any personal protective equipment (PPE) specified in the Risk Assessment.
- 7.10 No contractor shall undertake any hot work involving a naked flame or producing heat and / or sparks without the issue of a Permit to Work. This includes, but is not limited to: brazing, burning, cutting, grinding, soldering and torch applied roofing.

- 7.11 No contractor shall undertake any live work on electrical systems without first having completed a Risk Assessment to determine it is reasonable to work live and a Permit to Work issued.
- 7.12 No contractor shall undertake any work on a roof or enter a confined space without the issue of a Permit to Work.
- 7.13 No contractor or visitor is permitted to smoke anywhere inside the building other than at a designated external smoking point.
- 7.14 For some construction work (work lasting longer than 30 days with more than 20 workers working at the same time, or involving 500 person days of work), the HSE will be notified of the project as soon as possible before construction work starts.
- 7.15 Refer to the Contractors Policy (Doc ref OR88)

## **8 Accidents, Ill Health and First-aid**

- 8.1 The Organisation will ensure an adequate number of trained first-aiders and first-aid equipment is provided.
- 8.2 The first-aiders are responsible for taking charge of any person who may suffer injury or illness and administer first-aid in accordance with their training. If necessary, the emergency services are to be summoned by any person present at the scene of the accident or illness.
- 8.3 The first-aid boxes are inspected monthly and are replenished as necessary by the H&S Rep.
- 8.4 All accidents and cases of ill health at work are to be notified immediately to the Unit Manager or Deputy / Assistant Manager.
- 8.5 All accidents are to be recorded and reviewed by the Unit Manager or Deputy / Assistant Manager.
- 8.6 Health and Safety Manager is responsible for notifying RIDDOR reportable accidents to the Incident Reporting Centre by the following means:
- 8.7 The Unit Manager or Deputy / Assistant Manager will investigate all incidents, accidents and near misses with the assistance of the Head of Health Safety and Facilities and or Health and Safety Advisor for any Major Injuries as defined under RIDDOR.

8.8 Head of Health Safety and Facilities will be responsible for collating accident statistics and authorising any further risk control measures that may be recommended following analysis of such information.

8.9 ***A separate Accidents, Incidents and Near Misses Policy (Doc ref OR01), First Aid Policy (Doc ref OR39) have been produced by the Organisation and should be referred to.***

## **9 Aggression and Violence**

9.1 The Organisation is committed to ensuring employees are not abused, threatened or assaulted in circumstances relating to their work and we have a zero tolerance policy to violence and will do everything we can to prevent violent incidents which includes:

- physical violence – including kicking, spitting, hitting or pushing, as well as more extreme violence with weapons;
- verbal abuse – including shouting, swearing or insults, racial or sexual abuse; and
- threats and intimidation

9.2 As an employer Fair Ways responsibilities are:

- To carry out a risk assessment in respect of the potential for violence in the workplace.
- To provide instruction and training regarding violence at work. This is given to staff on induction and during other workplace training sessions such as Team Teach.
- To investigate all incidents, complaints, which relate to violence or aggression at work. All incidents are investigated by the service management and where deemed necessary escalated to the Quality, Safety and Governance Team.
- To consider installing or providing devices to raise an alarm in the event of an act of violence or aggression, e.g. panic alarms when necessary.
- To provide adequate security, e.g. locks, CCTV and avoid lone working, where practicable.

- A risk evaluation will be taken which considers the level of training and information provided, the environment and design of the job. The significant findings of the assessment will be recorded.
- If there is a violent incident involving employees, we will provide them with full support, including debriefing, time off work and legal help, where necessary.
- To report to the Enforcing Authority a death, specified injury or over-7-day physical injury. (This is covered under our RIDDOR policy and procedures).

## **10 Alcohol and Drugs**

10.1 The Organisation is committed to providing a safe and healthy working environment and we recognise that this can be put at risk by those who misuse alcohol or drugs to such an extent that it may affect their health, performance, conduct and relationship with colleagues at work and with other persons.

10.2 This policy, which applies to all employees, aims to:

- Promote the health and wellbeing of our employees and to minimise problems at work arising from the effects of alcohol or drugs.
- Identify employees with possible problems relating to the effects of alcohol or drugs at an early stage.
- Offer employees known to have alcohol or drug related problems affecting their work, referral to an appropriate source for diagnosis and treatment if necessary.

10.3 Consuming alcohol and taking of drugs in the workplace is prohibited by all employees, visitors, contractors and others and extends to within the site boundary including car parks and other external areas.

10.4 It is forbidden for employees to operate any work equipment including vehicles in an unfit state due to the influence of alcohol or illegal drugs and other substances, including prescription drugs that could impair their ability or to be in possession of illegal drugs whilst on Organisation's premises.

10.5 Any employee taking medicines or prescribed drugs under the direction of their Doctor, Dentist or Hospital Consultant must first obtain their permission to drive road vehicles on Organisation business whilst taking such medicines or prescribed drugs.

- 10.6 Employees wishing to take 'over the counter' medicines must first of all declare to the pharmacist their desire to drive road vehicles whilst taking the medication and must not do so if advised whilst taking the medication.
- 10.7 In any event all employees should read the leaflet provided with any medicine or prescribed drug prior to using work equipment or driving a road vehicle and if any doubt they should seek advice from a qualified medical practitioner or pharmacist.

## **11 Asbestos**

11.1 It is the Organisation's policy to ensure that our employees, contractors and visitors are not exposed to asbestos containing materials.

11.2 In particular the **Health and Safety Team** will:

- Take reasonable steps to find materials in the premises likely to contain asbestos and to check their condition.
- Presume that materials contain asbestos unless there is strong evidence to suppose they do not.
- Make a written record of the location and condition of asbestos and presumed asbestos-containing materials and keep the record up to date.
- Assess the risk of the likelihood of anyone being exposed to these materials.
- Prepare a plan to manage that risk and put it into effect to ensure that:
  - i. any material known or presumed to contain asbestos is kept in a good state of repair;
  - ii. any material that contains or is presumed to contain asbestos is, because of the risks associated with its location or condition, repaired or if necessary removed; and
  - iii. information on the location and condition of the material is given to anyone potentially at risk

11.3 It is the Organisation's policy to ensure that our employees and other persons are not exposed to asbestos containing materials.

11.4 We will take reasonable steps to determine that asbestos containing materials are not present within any of our occupied buildings.

Asbestos Policy [DOCREF OR85]

## 12 Broken Bottles and Glass

- 12.1 It is The Organisation's policy to ensure that our employees are not injured whilst handling broken bottles and glass.
- 12.2 Suitable dust pans and brushes will be provided.

## 13 Display Screen Equipment

- 13.1 Whilst it is generally recognised that the use of display screen equipment (DSE) can be undertaken without undue risks to health it is appreciated that some employees may have genuine reservations and concerns. The Organisation will provide information and training to DSE users to enable a fuller understanding of these issues.
- 13.2 In particular, all members of staff working at a computer for consecutively longer than 1hour on a daily basis will complete an assessment of their own DSE activities and the Organisation will provide 'DSE Users' eye examinations when requested and where found necessary, corrective appliances i.e. VDU glasses at a reasonable cost.

## 14 Driving

All employees who are required to drive on Organisation business will be provided with a *separate Driving at Work Policy (Doc ref OR21)*.

## 15 Electricity at Work

- 15.1 All reasonably practicable steps will be taken to secure the health and safety of employees who use, operate or maintain electrical equipment. The Head of Health, Safety and Facilities will ensure that only competent people are permitted to maintain electrical equipment or electrical systems and wherever practicable, electrical equipment and electrical systems will be switched off whenever any maintenance work is required.
- 15.2 The Head of Health, Safety and Facilities / Health and Safety Manager is responsible for ensuring the fixed electrical system is periodically inspected and tested by a competent person and any parts found to be defective will be repair or replaced.

15.3 The Head of Health, Safety and Facilities / Health and Safety Manager will ensure that portable electrical equipment is periodically inspected and tested by a competent person and any equipment found to be defective will be withdrawn from use for repair or disposal.

15.4 Refer Electrical Safety Policy [DOCREF OR82]

## **16 Gas Equipment**

16.1 The Organisation recognises the risk associated with the failure of gas equipment.

16.2 The Head of Health, Safety and Facilities is responsible for ensuring all gas equipment is maintained in a safe condition appropriate for its use and it is periodically inspected and tested by a Gas Safe registered contractor and should any parts found to be defective they will ensure it is not used until repaired or replaced.

16.3 The Unit Manager or Deputy / Assistant Manager is responsible for ensuring all gas equipment has up to date inspection certificates and will ensure any gas equipment without a valid certificate is withdrawn from use immediately until inspected by a competent person.

## **17 Hazardous Substances**

17.1 The Organisation acknowledges that no substance can be considered completely safe and therefore everything reasonably practicable will be done to ensure that our employees and other persons are not exposed to substances potentially hazardous to their health.

17.2 A COSHH File is maintained at each property including the Hazard Data Sheets obtained from the hazardous substances manufacturer / supplier.

17.3 Suitable and sufficient Risk Assessments will be undertaken by the Unit Manager and appropriate precautionary control measures put into effect including secure storage and safe use.

17.4 The Unit Manager will make relevant details available to employees what precautionary control measures are needed. Where deemed necessary by the risk assessment personal protective equipment will be provided to employees along with adequate information and instruction.

17.5 In addition to the substances purchased, consideration will also be given for assessments where necessary will be undertaken for hazards caused by process (dust generation / exhaust fumes) and biological risks (potentially leptospirosis).

- 17.6 ***A separate COSHH Policy (Doc ref OR18) has been produced by the Organisation and should be referred to.***

## **18 Highly Flammable Liquids**

- 18.1 There are generally limited highly flammable liquids used by FairWays, however there is some associated with grounds maintenance and potentially decorating/maintenance. In these instances the Maintenance Manager must ensure that when in storage these are stored in an appropriate flame proof metal cabinet with appropriate signage displayed. Signed highly flammable storage cabinet. Where there is a need to transport to another site, limited quantities will be transported, where transported will be secured against damage and leaking.

## **19 Housekeeping**

- 19.1 Poor standards of housekeeping often cause 'slips, trips or falls' and are consequently one of the most common causes of accident and injury at work.
- 19.2 The Organisation recognise the need to ensure that good standards of housekeeping are achieved and maintained at all times and everybody is responsible for ensuring that all areas of the premises are kept free of slip, trip and fall hazards and a policy of 'clean-up as you go' will always be the preferred option.
- 19.3 The Organisation acknowledges that it has a duty to ensure that a safe means of access and egress shall be maintained at all times.
- 19.4 The Unit Manager or Deputy / Assistant Manager will ensure that all internal and external floors shall be maintained to avoid slips, trips and falls and to report any defects to the Head of Health, Safety and Facilities which they cannot rectify themselves.
- 19.5 The H&S rep undertakes a documented monthly inspection of their premises.

## **20 Infection Control**

- 20.1 *You should refer to the specific Fair Ways Infection Control Policy (Doc ref OR31)***

## **21 Ladders and Stepladders**

- 21.1 Falling off ladders and stepladders is a common cause of accidents and the Organisation will take particular care to ensure that they are suitable for the task.

- 21.2 Only competent employees who have completed practical ladder training are permitted to work up a ladder.
- 21.3 Assessments of work activities that involve the use of ladders or stepladders will be undertaken to determine they are the most appropriate type of work equipment.
- 21.4 Relevant Unit Managers will ensure that ladders and stepladders kept and used are properly constructed and regularly inspected for damage.
- 21.5 Any damaged ladder or stepladder will be immediately taken out of use and not used again unless it can be repaired and brought back to its original condition when new.

## **22 Legionella**

- 22.1 The Organisation recognises the risk associated with the growth of legionella and an assessment will be undertaken which will include:
  - Identifying whether there are conditions present that will encourage bacteria growth and multiplication including the growth of legionella.
  - Identifying the hot and cold water temperatures throughout the buildings water storage and distribution system to locate any systems or areas where water may be stored or distributed between 20-45°C.
  - All areas or services capable of releasing an aerosol will be identified and where necessary measures put in place to control the risks.
- 22.2 Refer Legionella Management Policy [DOC REF OR83] for further information.

## **23 Lifting Equipment**

- 23.1 The Organisation recognises the risk associated with the failure of lifting equipment and the Head of Health Safety and Facilities / Maintenance Manager / Department Manager Brecon site will ensure all lifting equipment is maintained in a safe condition appropriate for its use.
- 23.2 All lifting equipment used for lifting or lowering a person or lifting accessories will be examined by a competent person at intervals not exceeding 6 months. All other lifting equipment will be inspected at intervals not exceeding 12 months.

23.3 The Head of Health Safety and Facilities / Maintenance Manager / Department Manager Brecon site is responsible for ensuring all lifting equipment has up to date examination certificates and will ensure any lifting equipment without a valid certificate is withdrawn from use immediately until inspected by a competent person.

23.4 Only competent employees who have been trained will operate lifting equipment.

## **24 Lighting**

24.1 The Organisation regards the provision of a safe and well-lit working environment as fundamental to health, safety and wellbeing of our employees and all reasonable steps will be taken to ensure that lighting is adequate at all times.

24.2 The H&S rep undertakes a documented monthly inspection of their premises.

## **25 Local Exhaust Ventilation**

25.1 Local exhaust ventilation (LEV) systems will be provided where risk assessment has identified increased risk from airborne hazardous substances, primarily this will be in relation to vehicle maintenance.

25.2 Where located they will be subject to testing in accordance with the Control of Substances Hazardous to Health Regulations to ensure the ventilation afforded is in line with its designed specification and performance required. They will also be inspected/checked for leaks periodically.

## **26 Manual Handling**

26.1 Statistics show that poor manual handling is also one of the most common causes of injury at the workplace and these injuries often have long term effects.

26.2 The Organisation policy is to reduce the risk of manual handling injuries as far as is reasonably practicable and to provide appropriate guidance to our employees on the measures that should be taken to ensure safe lifting and carrying.

26.3 Risk Assessments of the manual handling and lifting tasks deemed to be hazardous will be undertaken by the Department Manager.

26.4 All employees will be provided with appropriate information, instruction and training to enable them to carry out manual handling tasks without injury to themselves.

**26.5** *Refer to the specific Fair Ways Manual Handling Policy (Doc ref OR17) for more information*

## **27 Monitoring of Health and Safety Management Systems and Provisions**

27.1 Risk control systems and workplace conditions will be monitored by the following:

**Weekly checks** will be carried out by the frontline staff. These will be recorded in our Health and Safety folder or via our online Clear Care monitoring and reporting system.

**Monthly reviews** will be completed by the H&S reps and handed to the Unit manager for sign off. The Unit Manager will complete the monthly H&S feedback form using the information reported in the H&S rep checklist and submit this to the organisations health and safety lead by the 6<sup>th</sup> of each month.

**Quarterly Health and Safety Self Audit Checklists** will be carried out and completed by the service manager. The checklist is to evidence management oversight of health and safety. The manager will take the time to inspect and review each topic. Any non-satisfactory response, including uncertainty of a topic, will result in the need for further action. These actions should be allocated an Action Number (AN) and a corresponding entry and plan added to the Action Log.

27.2 Employees are encouraged to report any defects or other matters of concern to their Line Manager.

27.3 In addition health and safety audits of the premises will be undertaken by the Health and Safety Manager / Consultant from time to time.

27.4 Any defects or matters of concern arising out of the audits undertaken by the Health and Safety Manager / Consultant will be reported to the Unit Manager immediately for appropriate corrective action to be taken, if within their capabilities.

27.5 The Health and Safety Manager will provide a report to the Head of Health, Safety and Facilities to ensure appropriate corrective action is taken.

## **28 Noise**

28.1 Too much loud noise damages hearing by causing deafness or permanent tinnitus (ringing in the ears) and it is generally accepted that if you cannot hear clearly what

someone is saying (normal voice) 2m away, the noise level is likely to be 85dB(a) or higher.

28.2 The **Directors** are committed to not exposing employees to levels of noise which may be harmful to their health and we will reduce the risk of hearing damage to the lowest level reasonably practicable.

28.3 In particular we will:

- Undertake an assessment of noise exposure when we believe the first action level of 80dB is exceeded.
- Recommend that employee wear hearing protection when the assessment confirms noise levels are between 80dB(a) and 85dB(a).
- Mark hearing protection zones when noise levels exceed 85dB(a) and ensure that hearing protection is worn at all times by anybody entering the hearing protection zone and exposed to noise levels exceeding 85dB(a).
- Provide information and training for exposed workers.
- Provide regular health surveillance for those who are exposed to noise levels exceeding 87dB(a).

## **29 Occupational Health and Health Surveillance**

29.1 Occupational health embraces the effect of work on health, whether through sudden injury or through long-term exposure to agents with latent effects on health, and the prevention of occupational disease through techniques which include health Surveillance, ergonomics and effective management systems; the effect of health on work, rehabilitation and recovery programs; helping the disabled to secure and retain work; managing work-related aspects of illness with potentially multi-factorial causes (e.g. muscular-skeletal disorders, coronary heart disease) and helping employees to make informed choices regarding lifestyle issues.

29.2 Fair Ways use an external company for occupational health provision.

## **30 Personal Protective Equipment (PPE)**

30.1 The Organisation will provide personal protective equipment (PPE) when the risk represented by a work activity cannot be adequately controlled by other means, where determined by the risk assessment.

30.2 The Unit Manager or Deputy /Assistant Manager will give such information and instruction during the induction process to enable employees to understand the importance of wearing PPE where it is required.

30.3 Employees shall sign for receipt and use of PPE and shall report any defects to their Line Manager.

### **31 Pest Control**

31.1 From time to time it may be necessary to use pest control. Where this is required we will obtain relevant documents action from the contractor in relation to any substances in use and any bait boxes required to be used, the bait boxes will only be put in place behind locked doors not accessible by the service users. No staff will be required to move these and it will be the sole responsibility of the contractor to monitor.

### **32 Pregnant and Nursing Mothers**

32.1 All female staff shall be advised on recruitment that they are required to notify their Line Manager in writing should they become pregnant or a new mother (that is a woman who has given birth within the last six months or who is breast-feeding).

32.2 On receipt of formal notification the Line Manager will refer to the generic risk assessment and will regularly complete an individual risk assessment of that person's work -*Refer to the New and Expectant Risk Assessment Form.*

32.3 For any risks to which they are exposed or which represent additional risk because of pregnancy, recent birth or breast-feeding, efforts shall be made to reduce the risks.

32.3 Particular note shall be made of any representations from the woman's medical advisors (GP or anti-natal / post-natal).

32.4 If this is not possible, she shall be placed on paid leave until she either ceases to be pregnant or new mother, or suitable alternative work may be found.

### **33 Pressure Systems**

33.1 The company recognises as users and owners of pressure systems containing 'relevant fluids' that inspections by a competent person will be undertaken in accordance with the equipment's 'Written Scheme of Examination'.

- 33.2 Relevant fluids include steam, gases under pressure and fluids that are artificially kept under pressure and become gases upon release to the atmosphere, hot water boilers operating at more than 100°C, air conditioning and refrigeration plant with compressor motors exceeding 25kw.
- 33.3 The Service Manager will ensure that all pressure systems are regularly inspected by a competent person and serviced and maintained by a competent person.

## **34 Smoking**

- 34.1 The Organisation is committed to complying with 'No Smoking' legislation and provide a safe and comfortable smoke free working environment.
- 34.2 Smoking by any employee within any workplace building, enclosed area or motor vehicle used for Organisation business is strictly prohibited.
- 34.3 Smoking by employees is only permitted outside the building or enclosed area in designated areas and spent smoking material is to be disposed of carefully away from combustible materials within the facilities provided.

## **35 Snow and Ice**

- 35.1 The Unit Manager or Deputy / Assistant Manager will ensure all external walkways remain safe to walk on and will maintain appropriate supplies of gritting agents during the course of the winter months.
- 35.2 separate adverse weather policy detail to be included in here.

## **36 Stepladders**

- 36.1 Falling off stepladders is a common cause of accidents, and the Organisation will take particular care to ensure that they are suitable for the task.
- 36.2 Assessments of work activities that involve the use of stepladders will be undertaken by the Unit Manager and/or The Head of Health, Safety and Facilities to determine they are the most appropriate type of equipment.
- 36.3 The Unit Manager or Deputy / Assistant Manager will ensure that our stepladders are properly constructed and inspected monthly and recorded.
- 36.4 The Organisation will provide employees with instruction, training and other information on how to use stepladders safely.

## **37 Stress**

- 37.1 The Organisation recognises that workplace stress is a health and safety issue and acknowledges the importance of identifying and reducing workplace stressors.
- 37.2 The Health and Safety Executive define stress as “the adverse reaction people have to excessive pressure or other types of demand placed on them”. This makes an important distinction between pressure, which can be a positive state if managed correctly and stress which can be detrimental to health.
- 37.3 The Organisation will identify all workplace stressors and the Department Manager / HR department will conduct risk assessments to eliminate stress or control the risks from workplace stress.
- 37.4 The Organisation will consult with employees on all proposed action relating to the prevention of workplace stress.
- 37.5 *Refer to the specific Fair Ways Stress Policy (Doc ref OR38) for more information*

## **38 Vibration**

- 38.1 The **Directors** are committed to reducing the risk of injury and ill health caused by the effects of vibration in our work activities.
- 38.2 In particular we will assess the vibration risk to our employees to determine whether our employees are likely to be exposed above the daily exposure action value (EAV) of  $2.5 \text{ m/s}^2 \text{ A}(8)$  and if they are we will:
- Introduce a programme of controls to eliminate risk, or reduce exposure to as low a level as is reasonably practicable.
  - Provide health surveillance to those employees who continue to be regularly exposed above the action value or otherwise continue to be at risk.
  - The assessment will also determine whether our employees are likely to be exposed above the daily exposure limit value (ELV) of  $5 \text{ m/s}^2 \text{ A}(8)$  and if they are we will:
    - Take immediate action to reduce their exposure below the limit value.
  - Provide information and training to employees on health risks and the actions we are taking to control those risks.

- Consult with employees on our proposals to control risk and to provide health surveillance.
- Keep health records for employees under health surveillance.

### **39 Water temperatures**

- 39.1 Due to water being stored at a high temperature to minimise risk of Legionella bacteria developing, where deemed necessary by the building risk assessment, temperature control valves are fitted to taps to stop the risk of scalding occurring on premises where there is a risk to service users. These are checked on a monthly basis to ensure that the water does not exceed  $43^{\circ}\text{C} \pm 1^{\circ}\text{C}$ .
- 39.2 The service users independence, dignity and privacy must be respected at all times, but where a service user is at particular risk of scalding or drowning because of their mental state, extra care must be exercised to protect this vulnerable person from injury.

### **40 Welfare Facilities**

- 40.1 It is the Organisation's policy to ensure that all our employees have reasonable access to facilities provided in the workplace to consume food and drink during working hours. We will in any case ensure that a wholesome supply of drinking water can be obtained at all times.
- 40.2 The Organisation will provide suitable and sufficient rest facilities and facilities for storing clothing.
- 40.3 The Organisation will provide sufficient numbers of conveniences, readily accessible washing facilities including hot and cold water, soap or other means of cleaning along with a hygienic method of drying.
- 40.4 The Unit Manager or Deputy / Assistant Manager will ensure all welfare facilities are maintained in a clean and sanitary condition and are inspected weekly and recorded.

### **41 Windows (Glazing)**

- 41.1 If there is a risk of impact to glazing, an assessment will be carried out to ascertain if glazing installed is safety glass. Following the assessment, safety film will be applied by a specialist company in areas of high risk. If the glazing gets damaged, it will be automatically be replaced with safety glazing.

## **42 Working Alone**

- 42.1 Where employees are required to work alone, we will ensure that, so far as is reasonably practicable, steps are taken to protect their safety and health.
- 42.2 The Line Manger will assess the hazards and risks associated with lone workers and take steps to minimise them so far as is reasonably practicable.
- 42.3 In particular we will ensure that communication is established with lone workers appropriate to the circumstances.
- 42.4 ***Refer to the specific Fair Ways Lone Working Policy (Doc ref OR08)***

## **43 Work at Height**

- 43.1 The Organisation will do everything that is reasonably practicable to prevent anyone falling.
- 43.2 The Department Manager / The Head of Health, Safety and Facilities will undertake risk assessments of work at height activities undertaken by our employees.
- 43.3 In particular the risk assessments will:
- Avoid work at height where we can and ensure that no work is done at height if it is safe and reasonably practicable to do it other than at height.
  - Ensure the use of work equipment or other measures to prevent falls where we cannot avoid working at height.
  - Identify where we cannot eliminate the risk of a fall and will ensure the use of work equipment or other measures to minimise the distance and consequences of a fall should one occur.
  - Ensure all external work at height takes account of weather conditions that could endanger health and safety.
  - Ensure those involved in work at height including the use of all work equipment are trained, competent and appropriately supervised.
  - Ensure the place where work at height is done is safe.
  - Ensure equipment for work at height is appropriately inspected.

- Ensure the risks from any fragile surfaces are properly controlled.
- Ensure the risks from falling objects are properly controlled.

#### **44 Work Equipment**

44.1 The Organisation will take all reasonable steps to protect the health and safety of our employees when using equipment at work.

44.2 In particular the Head of Health, Safety and Facilities will ensure that:

- Any new work equipment we may from time to time purchase, is specified, designed and supplied to us in accordance with the appropriate standards and is CE marked.
- All work equipment will be maintained in accordance with the manufacturers' recommendations.
- The Service / Unit Manager or Deputy / Assistant Manager will ensure work equipment in their premises is safe to use and will conduct weekly/monthly inspections and record the findings.
- The Maintenance Manager will ensure work equipment used by maintenance staff is safe to use and will conduct monthly inspections and record the findings.

#### **45 Working Outside**

45.1 From time to time staff will be expected to work outside. This can result in increased exposure to UV light and to cold weather. Fair Ways will provide members of staff who are expected to work outside in cold conditions for prolonged period's suitable cold weather clothing. Where staff are expected to be outside in the course of their duties then they must wear appropriate apparel, (shirt / blouse etc.) this may include appropriate hat and sun protection lotions.

#### **46 Young Persons**

46.1 It is the Organisation's policy for a Risk Assessment to be undertaken by the Directors / the Head of Health, Safety and Facilities before we employ a young person (between the ages of 16 and 18), to ensure any risks are identified and addressed.

46.2 In particular the assessment will take into account:

- The inexperience and immaturity of the young person.
- Their lack of awareness of risks to their health & safety.
- The type of work equipment they will be required to use.
- Any hazardous substances they may be exposed to.

46.3 The Organisation is aware of the Statutory Restrictions imposed upon work undertaken by young persons and will comply with these restrictions. Young persons will be given the raised level of information, instruction, training and supervision required to enable them to work safely.

## **47 Event Risk Management**

The Organisation's primary concern is the safety of all our employees, children, students, visitors, contractors and other persons when participating in an external event and as such will appoint an event organiser who will have a duty to plan, manage and monitor the event to make sure that work colleagues and the visiting public (if applicable) are not exposed to health and safety risks. In general, smaller events to raise awareness for the company, fundraising or family fun days and staff development activities are covered under Fair Ways Insurance Policy subject to full risk assessments being in place and kept on file without referral. However large scale events will have to pass a 'threshold test' defined as high risk.

A separate 'How to Organise an Event Guide' has been produced by the Organisation and can be found on the companies intranet under 'Useful paperwork' and reference must be made to this prior to any event planning.

## **48 COVID19**

48.1 Fair Ways will follow the Government and HSE Guidelines regarding COVID19. A risk assessment will be carried out and reviewed as required. All relevant persons will be informed of the findings.

48.2 ***Refer to the Infection Control Policy (Doc ref OR31)***

## **49 Associated Documents**

- Fire Safety Policy OR04
- Accidents, Incidents and Near Misses Policy OR01
- Lone Working Policy OR08
- Risk Reporting Policy OR40

- First Aid Policy OR39
- Driving for Work Policy OR21
- Infection Control Policy OR31
- Manual Handling Policy OR17
- Contractors Policy OR88
- Electrical Safety Policy OR82
- Legionella Management Policy OR83
- Asbestos Policy OR85

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OR06	7	Full review of policy, re-wording and re-format of policy	Craig Morris	Nov 2017	QSGC
OR06	8	Review Minor word changes and amendment to Organisational chart to include Board of directors	Craig Morris	Aug 2018	QSGC
OR 06	9	Minor word changes 2.7 & 2.8	Craig Morris	Oct 2018	QSGC
OR06	10	Changes to H,S&W Policy statement and Management Organisation Chart	Craig Morris	March 2019	QSGC
OR06	11	Added Event Risk Management Point 47	Craig Morris	April 2019	PSC
OR06	12	Review added management role	Craig Morris	Nov 2019	QSGC
OR06	13	Full Review with minor word changes	Pavlina Turkova	January 2020	QSGC