Health & Safety Policy
Statement and General Arrangements

Final report  V14
LUC
April 2020
### Health & Safety Policy

#### Statement and General Arrangements

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<td>5.</td>
<td>2015 policy updated re CDM legislation changes; risk assessments; fire warden duties and working at height</td>
<td>P Lawson</td>
<td>J Smallwood</td>
<td>J Owen</td>
<td>14.06.2015 4.06.2015</td>
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<td>7.</td>
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<td>P Lawson</td>
<td>J Smallwood</td>
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<td></td>
<td>Change all reference to Director Responsible from Jeremy Owen to Andrew Clarke and updating offices to include Manchester and Lancaster</td>
<td>P Lawson</td>
<td>P Lawson</td>
<td>A Clarke</td>
<td>01.09.2017</td>
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<td>Annual review of policy with H&amp;S External Advisors – minor changes/updates including terminology for first aid personnel, terrorist attacks, site safety and vaping</td>
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<td>P Lawson</td>
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<td>P Lawson/J Redmond</td>
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<td>Updated Stress at work, working at height; responsibilities to reflect OOO; updated Ecology clothing; Amended H&amp;S Consultant to read Wilson Adrain</td>
<td>P Lawson / H Ash</td>
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<td>Updated with info on Sub-Consultants; Contractors; Expectant Mothers; Young Workers; Accident Reporting; H&amp;S communication and training; working at home and driving.</td>
<td>P Lawson</td>
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<td>P Lawson</td>
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Health & Safety Management System Statement

LUC (Land Use Consultants Limited) is an environmental consultancy covering spatial planning, landscape design, landscape planning & management, ecology and geospatial services. These services, as defined in our System Scope, are delivered across our offices in Bristol, Edinburgh, Glasgow, London (Registered Office) and Manchester, and through 5 functional business units as follows: Design; Ecology; GIS & Visualisation; Landscape Planning and Management and Planning Appraisal and Assessment is the policy of LUC to provide and maintain healthy and safe working conditions, equipment and systems of work for all our employees, and to provide such information, training and supervision when needed for this purpose as required under 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 along with other relevant legislation. We also commit to complying with any other applicable requirements relating to occupational health and safety hazards.

We also accept our responsibility to conduct our undertaking in such a manner as to ensure for the health and safety of other people not in our employment but who may be affected by our activities, as well as ensuring that our actions do not cause any injury or ill health to any of our employees or others that may be affected by our actions.

The allocation of duties for safety matters and particular arrangements that will implement this policy are set out in the Responsibilities and General Arrangements section. These form part of the Health & Safety Business Management System (H&S BMS) of the company. The H&S BMS is located on LUC’s integrated management system called Nest and all LUC employees have access to it at all times. External companies can request access to parts of, or the entire system as appropriate.

The Health and Safety Key Priorities and Objectives, as defined within our Health & Safety Management Plan, shall only be achieved through the actions of all employees in the company, whether directly employed or contracted to the company, and as we aim to continually improve the management of our H&S BMS, we request the co-operation of everyone towards promoting safe working practices and minimising accidents.

LUC’s Health & Safety policy is available to all staff and all new starts are required to read the policy. It will also be kept up to date with any policy or legislation changes and to reflect any changes in the size and/or nature of LUC’s workings. To ensure this, the policy and the way in which it is operated will be reviewed every year. By reviewing our systems periodically via our H&S Management Plan, accident reporting and annual system reviews, we commit to improving the organisation of our H&S BMS performance on an ongoing basis.

Authorised by:

Andrew Clarke – Director of Finance and Operations
Chapter 1
Organisational Chart
Chapter 1
Organisational Chart
Health & Safety Policy, Statement and General Arrangements
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Figure 1.1: LUC’s Organisational Chart for Health & Safety

Andrew Clarke
Director of Finance & Operations for LUC
Responsible for Health & Safety

With delegated responsibility to:

Wilson Adrain Safety Management Ltd
Tel No: 0141 503 0330
Health, Safety & CDM Advisors
John Ross / David Wilson

Phyllis Lawson
Health & Safety Contact
Tel No: 0141 334 9595
(H&S Qualification: Institute of Occupational Safety & Health — Working Safely for Middle Management)

HR Manager

H&S Contacts

Directors, Associate Directors, Associates, Principles, Line Managers & Project Managers

All LUC Employees
Chapter 2
Responsibilities

Overall Responsibility

2.1 Overall responsibility for Health and Safety lies with LUC’s Director of Finance & Operations. This includes the responsibility to allocate resources and delegate authority to appropriate staff to ensure that the terms of the Health and Safety Policy are met.

2.2 LUC accepts that to be successful, its Health and Safety Policy should involve the participation of staff at all levels. Under Section 7 of the Health and Safety at Work Act, employees have a duty to take reasonable care for their own health and safety as well as for any other persons who may be affected by their acts or omissions at work.

2.3 LUC also recognises its responsibility as a “Contractor” under Section 3 of the Act to conduct its operations in a way that ensures, so far as is reasonably practicable, that individuals are not exposed to risks to their Health and Safety. To meet these responsibilities a competent person may be appointed to consult on matters relating to Health and Safety. They will advise LUC and liaise with any other organisation on matters pertaining to Health and Safety with whom LUC may enter into a contractual agreement.

2.4 The Board of Directors recognises its responsibilities and reviews Health and Safety at their monthly Board meetings. The Health and Safety Policy Statement, responsibilities and arrangements are reviewed annually and submitted for Board approval on an annual basis.

The Director of Finance & Operations or whomever he appoints will:
- arrange for any necessary Health and Safety training for LUC employees;
- carry out regular audits of our health & safety systems and procedures;
- ensure that the Health & Safety Management Plan/KPIs are carried out within the required timescales;
- investigate accidents to any employees or members of the public and set corrective action plans. Where necessary, through the appointed person or First Aider, report accidents to the regulating authorities under RIDDOR (Reporting of Injuries, Diseases and

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Dangerous Occurrences Regulations 2013) and maintain appropriate records thereof.

Devolved Responsibility

2.5 Responsibility for operating the policy for LUC employees working within LUC premises or off-site, including sites and vehicles, lies with the Directors, Associate Directors, Associates, Principals, Line Managers, Project Managers and H&S Contacts to whom the employees report are responsible for assisting in implementing this policy at LUC offices including Glasgow, Edinburgh, Bristol, London and Manchester as well as any construction sites. First Aid qualified staff also have a responsibility to comply with specific duties under their role as First Aider or Appointed First Aid at Work Person.

2.6 Responsibility for carrying out risk assessments, under the Management of Health and Safety at Work Regulations, lies with the individuals in conjunction with their line manager or project manager. The Director of Finance & Operations may however appoint an assessor if this person is totally familiar with the range of operations of all employees under their control. In some cases, extra assessments relating to a task or activity may need to be carried out. This could be due to the age of employee (e.g. inexperience) or medical condition (e.g. pregnancy).

2.7 The Line Manager or Project Manager will be responsible for operating the policy within any work area, external or internal and will ensure that all employees/operatives act in accordance with it. This responsibility extends to ensuring that safe conditions are provided for any contractors who are working in or around the premises.

The Office & Support Managers/Health & Safety Contacts (“H&S Contacts”) will:

- act as the Health and Safety Contact for their office and report any findings, actions or queries raised to our Human Resources Management Group on a monthly basis;
- meet monthly to discuss any health and safety issues within each office and ensure that actions from the H&S Management Plan and Training Matrix are put into place;
- keep and maintain first aid records;
- advise on provision, maintenance and management of First Aid facilities and organise First Aid qualified personnel to check first aid boxes in LUC premises;
- liaise with the local Fire Authority and advise on Fire Risk Assessment, Fire Precautions, Fire Drills, Fire Fighting Equipment and Evacuations when necessary and keep and maintain all fire warden training records;
- be responsible for the maintenance and testing of the fire alarms and fire-fighting prevention and detection equipment;
- undertake office housekeeping checks on at least a monthly basis and review all office risk assessments on at least an annual basis;
- keep a record of all DSE assessments carried out within the office, review findings and record and monitor any actions taken;
- check and record driving licences for employees who drive hire vehicles, and driving licences, personnel car insurances and MOT certificates for employees who drive their own vehicles on company business;
- assist with regular audits of our health & safety systems and procedures, as directed by the Director of Finance & Operations;
- have the authority to make a decision on whether or not to evacuate the office if an emergency or dangerous/harmful situation arises;
- liaise with the local district council or borough environmental health department, Health and Safety Executive (H.S.E.) and similar bodies when necessary.

Directors, Associate Directors, Associates, Principals, Line Managers and Project Managers will:

- read and understand the Health and Safety Policy of LUC and accept responsibility for implementing it within LUC;
- if delegated to, assess the Health and Safety risks to employees and others who may be affected by LUC operations;
- set a personal example in demonstrating a concern for Health and Safety matters;
- ensure that employees carry out work safely and in accordance with any safety instructions and signage;
- ensure that employees adhere to the Personal Safety and Lone Working Policy or procedures noted on site risk assessments;
- ensure that they and their teams adhere to the LUC’s Out of Office working procedures;
- report any defects in premises, plant and equipment that they notice.

LUC Employees will:

- be responsible for their own Health and Safety and the Health and Safety of others who may be affected by their
acts or omissions within LUC premises or when operating on client’s premises including construction sites;
- read and understand the Health and Safety Policy of LUC;
- report immediately to their Director, Associate Director, Associate, Principal, Line Manager, Project Manager or H&S Contact any unsafe conditions or defects in the premises or equipment that they notice;
- report immediately to their Director, Associate Director, Associate, Principal, Project Manager or H&S Contact any unsafe acts or systems which they notice;
- seek safety information from their Director, Associate Director, Associate, Principal, Line Manager, Project Manager or H&S Contact if uncertain of any process or procedure;
- co-operate with their Director, Associate Director, Associate, Principal, Line Manager, Project Manager or H&S Contact to enable them to implement the Health and Safety policy;
- LUC recognises that some workers may from time to time be at increased risk of injury or ill-health resulting from work activities. LUC therefore requires all employees to advise the HR Manager if they become aware of any change in their personal circumstances which could result in them being at increased risk. This could include medical conditions, permanent or temporary disability, taking medication or pregnancy.

LUC First Aiders or Appointed First Aid at Work personnel will:
- assess a situation quickly and safely and summon appropriate help and to protect casualties and others at the scene from possible danger;
- identify, as far as possible, the injury or nature of illness affecting a casualty and to give each casualty early and appropriate treatment;
- remain with the casualty until appropriate medical assistance is available or arrange for transportation to hospital or to his or her home if required;
- take care to prevent cross-infection between them and the casualty;
- be responsible for checking the office first aid boxes, including expiry dates of bandages etc. on a regular basis but at least 6-monthly;
- record accurately the details of any accident, incident or near miss in the office accident book;
- ensure that the accident report procedure is followed and that the H&S Contact is made aware of the accident, incident or near miss as soon as it occurs. If the H&S Contact is not available, then details should be forwarded to another H&S Contact, the Director of Finance & Operations, or HR Manager, as soon as possible;
- ensure that their first aid skills and training are kept up to date.

LUC Fire Wardens and Fire Marshalls will:
- assess any situation quickly, safely and calmly then raise the alarm by activating the break glass point if not already activated;
- be familiar with all means of escape from their office;
- ensure that any evacuations are carried out quickly but in an orderly manner by directing all personnel within that area to the nearest available exit;
- conduct a quick but thorough sweep of their designated area to ensure that all staff, visitors, contractors and any other personnel within their area have left the building, if it is safe to do so;
- during the sweep they should also attempt to isolate any heaters and close any windows or doors that may have been left open, providing it is safe to do so;
- only use portable fire-fighting equipment if they are trained to do so and feel confident to handle the fire but only if it is small enough to control easily;
- once outside, ensure that emergency services have been called;
- the fire warden should take a register to ensure that all staff have been evacuated safely then report to the person in charge of the building evacuation to advise if all personnel have been evacuated safely or if there is anyone still in the building, or who are unaccounted for;
- once the fire brigade have ascertained that it is safe to return to the building, the fire warden would assist staff return to their posts if required;
- in the absence of the H&S Contact or a Director, have the authority to make a decision on whether or not to evacuate the office if an emergency or dangerous/harmful situation arises.
Chapter 3
Communication

Communication of Health & Safety

3.1 Our Health & Safety and People Policies are available for all staff to read on LUC’s Nest, our integrated management site. They are reviewed annually, or as required, with any updates advised to staff via email and/or our Weekly Staff Newsletter which all staff are required to read. Health and safety, both in the office or on site, is part of our induction training given to all new staff.

3.2 LUC’s H&S Contacts covering each office act as the day to day point of contact that staff can speak to in the first instance regarding any health and safety matter.

3.3 Health and safety is a standing agenda item at our monthly staff meetings that all staff are required to attend when we advise any changes to policies, health and safety related practices or other relevant health and safety updates. A reminder of staff responsibilities under our Health & Safety Policy are given to all staff at least annually and fire evacuation procedures are given at least every 6 months at these meetings. Health and safety is also a standing agenda item at our monthly Human Resources Management Group meeting and our monthly Board of Directors Meeting. A full annual review of Health and Safety is presented to our Board Directors annually.

3.4 The H&S Contacts meet monthly to discuss any health & safety related incidents within each office and to put into place any health & safety actions required from the Management Plan and Training Matrix. The Minutes from these meetings are available for all staff to view on Nest.

Health & Safety Training

3.5 LUC’s HR Manager is responsible for training within the company although the responsibility for arranging health and safety related training identified by risk assessments or changes to an employee’s role, lies with the Director of Finance & Operations in conjunction with the H&S Contacts and Line or Project Managers. Health and Safety training or information for employees will be available at regular intervals as appropriate to extend or update staff knowledge.

3.6 As part of our H&S Management System, a Training Matrix is compiled at the start of each year detailing all training actions to be taken within given timescales. The Training
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Matrix is updated as and when required and the H&S Contacts are responsible for ensuring these actions are put into place.

3.7 The H&S Contact/Line Manager will arrange for health and safety induction training of new employees. This will include the Health and Safety at Work Act 1974, the Health and Safety Policy, Fire Precautions and Procedures, General Work Equipment, Ergonomics, Hygiene, Safe Use of Machinery and Materials and where appropriate, all Personal Protective Equipment. Any new equipment being introduced will require employees to be trained on that equipment and possibly a period of initial close supervision. Employees will be briefed before re-location to a new or unfamiliar site and will be inducted onto the site before work commences.

3.8 Health & Safety Site Working Induction is given to all new starts who may carry out site work out of the office along with hazard identification training.

3.9 All relevant staff are required to attend refresher training sessions on site working procedures at least annually.

3.10 Specialised health and safety training may be required in the use of certain materials, skills or equipment and LUC or another suitably qualified Agent will carry this out. Any such training will be approved by the Director of Finance & Operations in conjunction with the H&S Contact and/or project manager with the budget being approved by the HR Manager.

3.11 For further details refer to the Training and Development Policy located in our People Policies Basket on Nest.
Chapter 4
General Arrangements

First Aid and Accidents

4.1 First aid and accidents:

- A First Aid Box and accident book is located in the Reception (or as identified) area within each office including Glasgow, Edinburgh, Bristol, London and Manchester.

- Notices are posted on notice boards informing employees where the First Aid box is and who the appointed persons are.

- Trained First Aid personnel available at all locations are responsible for First Aid boxes in each office.

4.2 The person responsible for reporting incidents, other than reportable accidents, is the H&S Contact, failing which one of the other H&S Contacts, the Director of Finance & Operations or HR Manager. All accidents or injuries, no matter how trivial, must be reported and entered into the accident book. The H&S Contact will prepare where appropriate an accident investigation report and follow up any recommended actions. Our Human Resources Management Group will then review all accidents as part of their meeting agenda and may recommend any further appropriate action to avoid reoccurrence.

4.3 The Director of Finance & Operations will ensure that suitable First Aid facilities are available on all sites/premises whether LUC is in overall control of the site/premises or not. Should any injury require treatment further than first aid, the employee must be taken to the Accident and Emergency Department at the nearest appropriate hospital either by a member of staff or by Ambulance.

Accident Reporting

4.4 All accidents shall be reported in the first instance to the H&S Contact who will then liaise with our Director responsible for Health & Safety and our External H&S Consultants regarding any major or reportable accident or incident requiring further medical or emergency services assistance. This will ensure that not only the legal requirements (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations, 2013) are complied with, but that all possible measures are taken to prevent a recurrence or similar type of accident taking place. Accidents can be categorised as follows:
Near Miss Accidents or Occurrences, which take place but do not cause injury to persons or damage to property

Minor Injury Accident, where a minor injury has occurred not requiring any medical treatment and incurring no lost working time. The injured person only requires minor first aid treatment, if any, and returns to work

Medical Treatment Accident, where a minor injury has occurred requiring medical treatment by a GP or at the hospital or other medical establishment where the injured person is able to return to work after treatment

Over 3 Days Incapacitation, the injured person is off work for more than 3 days, not including the day of the accident but including weekends, but the incident or injury is not reportable

Reportable Accidents, resulting in a specified injury as defined in LUC’s Accident Reporting Procedure Note, or accidents resulting in death shall be reported direct to a H&S Contact in the first instance who will then liaise with the Director responsible for Health & Safety and our External H&S Support Consultants, who will then contact the Health and Safety Executive using their online system (www.hse.gov.uk) to submit a form F2508 or F2508A. The report must be submitted within 10 days of the accident. Any accident at work resulting in a person being off work for more than seven days, not including the day of the accident but including weekends, must also be reported on form F2508 or F2508A within fifteen days of the accident, through the Director responsible for Health & Safety, to the Health and Safety Executive

Accident Investigation

4.8 All the above-mentioned accidents and/or dangerous occurrences shall be investigated by management to determine the cause and where possible, to take immediate action to prevent a similar accident or dangerous occurrence taking place. Where this action cannot be carried out immediately, a recommendation shall be made to the Director responsible for Health & Safety or his nominee in his absence. They should be notified to a H&S Contact in the first instance so that the appropriate actions can be taken.

Fire Safety

4.9 General fire safety:

Responsibility for checking that all working areas have adequate cover in the event of a fire and that escape routes are clean and clear is that of the H&S Contact at Glasgow, Edinburgh, Bristol and London who will carry out weekly checks. The H&S Contact will also maintain training records and ensure suitable and sufficient adequately trained employees are in place.

In the event of a fire, the alarm should be raised, and all persons removed and evacuated from the area under risk immediately until that area has been deemed safe.

The H&S Contacts will ensure that fire risk assessments are undertaken for Glasgow, Edinburgh, Bristol, London and Manchester.

The H&S Contact will ensure that fire evacuation drills, call point checks, fire system maintenance etc. are carried out in each office building and will ask the Landlord for evidence that the necessary checks and maintenance have been carried out.

Smoking – LUC operates a smoke free policy in the workplace, including the use of e-cigarettes or vaping,
which also applies when in vehicles, on site and in client’s premises.

**Fire Procedure**

**On Discovering a Fire:**
- Sound the alarm.
- Call the Fire Brigade by dialling 999 from the nearest telephone or 112 from a mobile.

**On Hearing the Fire Alarm:**
- Leave the building by the nearest fire exit.
- Do not stop to collect personal belongings.
- Go to the designated Fire Assembly Point. This applies to all LUC premises and sites including Glasgow, Edinburgh, Bristol, London and Manchester.

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**Fire Safety Advise**

**Means of Escape:**
- Fire doors are provided to prevent the spread of heat and smoke. Keep them shut when not in use and never prop them open or remove self-closing devices.
- Keep corridors and stairways clear of storage and waste materials.
- Ensure that final exit doors can be opened from the inside without the use of a key, keeping areas outside clear of obstructions at all times.

**Fire Alarm System and Extinguishers**

4.11 Fire alarm systems and extinguishers will be maintained in working order and staff will be trained regularly in evacuation procedures.

4.12 Fire extinguishers are intended for fires in the early stages, employees will be shown where they are located. Employees are not expected to tackle a fire themselves unless they are trained and feel able to do so.

4.13 Fire extinguishers are inspected and maintained on an annual basis. The H&S Contact is responsible for ensuring that the maintenance and testing of the fire alarms and fire-fighting prevention and detection equipment is carried out.

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**Bombs, Suspicious Packages and Terrorist/Firearms Attacks**

4.14 On receipt of a notification, telephone call or other message alerting the company of a potential bomb or suspicious package on the premises, you should immediately notify Senior Management and the Police with details of message received, then:

**Bomb Alert Evacuation Procedure:**
- Evacuate the premises, if safe to do so, by shouting “FIRE, FIRE, FIRE” to alert employees to leave the building immediately and encourage them to take with them their coats, handbags and briefcases etc. and assemble outside for a roll call.
- **DO NOT** operate the fire alarm system or electrical switches as this could trigger the operation of the suspicious devices.
- Await further instructions from the emergency services. Do not enter the building again until advised by the senior incident officer that it is safe to do so.

4.15 In the event of a Terrorist or Firearm attack then immediately:

**Terrorist or Firearms Attack Evacuation Procedure:**
- Individuals must evacuate the area using the following guidance:
  - **RUN** – to a place of safety. This is a far better option than to surrender or negotiate. If there’s nowhere to go then,
  - **HIDE** – it’s better to hide than to confront. Remember to turn your phone to silent and turn off vibrate. Barricade yourself in if you can. Then finally and only when it is safe to do so,
  - **TELL** – the police by calling 999 or 112.
- Once in a place of safety and able to obtain a phone network connection, contact another LUC office, or senior member of staff, to advise you are safe.

**Advice and Notification**

4.16 Any advice needed or advice on notification of accidents and/or fire can be obtained from:

Wilson Adrain Safety Management Ltd
Huntershill Business Centre
25 Auchinairn Road
Housekeeping and Premises

4.17 Housekeeping and premises:

- Cleanliness – all LUC premises and temporary offices will be cleaned on a regular basis, at least once a week.
- All employees are expected to organise their workspace in an orderly manner prior to leaving at night.
- Waste Disposal – suitable containers will be provided at all LUC premises and temporary offices. Waste materials are required to be disposed of in the appropriate receptacles provided by LUC at their office premises.
- Safe Stacking and Storage – sacks, other than for general waste, will be clearly marked with the contents.
- High piling of even apparently light materials is hazardous. Materials/objects should not be piled above a safe height.
- Heavy objects should not be lifted or manoeuvred without assistance.
- Marking and Keeping Clear Gangways, exits etc. – suitable signs will be used to mark exits, escapes and safe passages.
- Checking Ladders – any ladders within the office will be checked by the H&S Contact as part of their monthly housekeeping check. Prior to use, a visual check of the ladder should be made as described in the Ladder section below.
- Floors and Parking – areas are to be kept free of oil or other materials at all times.
- Meeting Spaces/Common Facilities – should be cleared after use of waste and refreshments.
- Smoking – LUC operates a smoke/vape free policy in the workplace, which includes vehicles, on site and in client’s premises. Smoking is not permitted within the immediate surrounding area of the building. Any contravention of this policy will lead to disciplinary action.

4.18 All employees shall co-operate with the management in:

- keeping all offices, site accommodation, wash places and lavatories in good order;
- ensuring that all waste disposal is carried out in a safe and orderly manner;
- ensuring that all doorways, passageways and walking areas are kept free of obstructions in order to ensure safe access and egress.

Contractors and Visitors

4.19 Contractors and visitors:

- All visitors will report to Reception on arrival at LUC offices where they will be asked to read the Welcome Notice and then sign in the Visitors Book as an acceptance of the conditions of the notice.
- All employees visiting other LUC offices must report to Reception upon arrival, read the Welcome Notice and sign the visitors’ book.
- All visiting contractors/tradesmen will adhere to the above and then report directly to the H&S Contact or nominated person for further instructions and guidance.

4.20 Contractors will be vetted for competency prior to appointment to ensure that they have suitable arrangements for health and safety and have valid qualifications and insurance cover in place. All Contractors employed by LUC will provide risk assessments and where applicable method statements.

4.21 Contractors will be asked to complete an additional sign-in form upon arrival to the office to ensure that all works are agreed in advance and that all work is done as safely as possibly with minimum disruption to others.

4.22 The H&S Contact will be responsible for the office and will monitor all Health and Safety matters and will be empowered to stop all work until satisfied that the Company Regulations are being met.

Sub-Consultants

4.23 All sub-consultants appointed to carry out works by LUC are required to be approved for use prior to commencing any works. They are asked to provide evidence of their technical competence as individuals, and of the suitability of their organisation such as company policies and certifications and insurance arrangements. If they have no sufficient health & safety policy or certification, they are asked to comply with LUC’s Health & Safety Policy. Once approved, they are also required to complete a Sub-Consultants Agreement specific to each project. The Sub-Consultant is also required to provide a risk assessment and method statement for each project prior to commencing any works.

Young Workers

4.24 LUC shall endeavour to ensure that all employees and contractors remain diligent as to young persons who may be
employed at or enter the vicinity of works. A Young Person is defined as anyone under the age of 18. A Young Person Risk Assessment must be completed at the outset to assess any risks and ensure that suitable control measures are implemented as far as reasonably practicable. The guidance within this policy shall be followed alongside the risk assessment methodology for that particular place of work.

New or Expectant Mothers

4.25 Once notified in writing by the employee, suitable risk assessments on the activities performed by the new or expectant mother must be carried out to ensure there is no risk to her or her unborn child. The risk assessment will be reviewed on a regular basis throughout the pregnancy to ensure suitable control measures are in place.

Lone Working

4.26 Occasionally employees will be alone for various periods of time either within LUC premises, on client’s premises or when travelling to visit a site etc. The Director of Finance & Operations, H&S Contact or Project Manager or whoever they appoint, will carry out an assessment of the risks involved.

4.27 Regardless of the outcome, employees will be made aware of LUC’s Personal Safety and Lone Working Policy and the increased risks associated with lone working during induction. Lone working will only be tolerated under controlled conditions and will be authorised by the Director of Finance & Operations or whoever he appoints. Employees who are about to enter a lone working situation should be familiar with the proposed area of operation and they must inform their Line Manager, Project Manager or H&S Contact of their intended location and approximate time of arrival and return. Portable communications may be issued to improve the system and reduce the level of risk.

Personal Protective Equipment (PPE)

4.28 With reference to the Personal Protective Equipment at Work Regulations 2002, LUC will ensure that all our employees use suitable PPE while they are at work. All employees shall be issued with and be required to wear the necessary safety/protective equipment at all times to allow them to perform their tasks in a safe manner. Such items shall include hard hat, Hi-Viz vest and protective footwear and, if appropriate, facemask, eye and ear protection and/or safety harness when working at height. Specific reference to PPE is made for each project through the Site Safety Induction Briefing or via the Site Risk Assessment. In addition, the Ecologists should refer to the Ecology Business Unit’s Team Handbook.

Manual Handling

4.29 The nature of our business is that very little manual handling tasks are undertaken and if unavoidable, LUC’s Manual Handling Risk Assessment must be read and adhered to in order to ensure the task is carried out as safely as possible. If the task does not fit within the parameters of the standard risk assessment, then additional potential hazards must be assessed with additional controls put in place before carrying out the task. Any such risk assessment of the task must be carried out by the H&S Contact, Project Manager or an appointed competent person using LUC’s standard Manual Handling Risk Assessment form. The assessment will identify any particular hazards to employees and how risk is to be removed or reduced to an acceptable level.

4.30 Assessments should take into account:

- the task to be undertaken;
- the weight, shape, size of the load to be lifted or moved;
- the working environment, e.g. excessive heat or cold, space available etc.;
- the individual’s capability;
- the distance the object(s) are to be moved.

4.31 Any risk assessment undertaken must be recorded and the results made known to the person(s) affected. A review of this assessment will be required if conditions change. All practicable means of reducing the need for manual handling of loads must be taken wherever possible. Mechanical plant or handling aids should be utilised wherever possible.

Working at Height Regulations 2005

Responsibility

4.32 The H&S Contact, Project Manager or whoever he appoints (the Duty Holder) must first assess the risks of working at height to ensure that work is properly planned, supervised and carried out by competent people. Generally, only low-risk, relatively straightforward tasks will be undertaken by LUC staff with working at height being avoided if possible. The regulations state a place is ‘at height’ if (unless the regulations are followed) a person could be injured falling from it, even if it is at or below ground level.

4.33 If working at height is unavoidable, then LUC’s Working at Height Risk Assessment must be read and adhered to in order to ensure that the task is carried out as safely as possible. If the task does not fit within the parameters of the standard risk assessment, then additional potential hazards must be assessed with additional controls put in place before carrying out the task.
4.34 Once the task has been assessed and approved, the appointed Duty Holder must advise the Project Manager or team and the Employee must:

- read, accept and adhere to the risk assessment carried out, including planning for emergencies and rescue and postponing work if weather conditions endanger health or safety;
- report immediately any potential safety hazard to the H&S Contact, Project Manager or the appointed Duty Holder;
- ensure that all equipment is checked prior to use and is used in a proper and responsible manner at all times. If a ladder is being used, then the ladder checklist below must be adhered to;
- any required training will be arranged by or given by the H&S Contact, Project Manager or appointed Duty Holder if required.

4.35 If tree climbing is specifically requested, then only staff with the relevant and valid tree climbing certification are permitted to carry out this work and a risk assessment must be completed prior to the works commencing. A thorough examination of the equipment will be carried out by a competent person at the required intervals to comply with the LOLER Regs. The users have been trained to carry out a pre-use check of the equipment prior to each and every use.

Ladders

4.36 The use of ladders should only be for low-risk, short duration tasks of 30 minutes or less and in situations where they can be used safely e.g. where the ladder will be level and stable. If a ladder is the only option for the task, then it must be suitable and in a safe condition and the following checks must be carried out before use:

- a pre-check of the area must be carried out to ensure that it is safe to use a ladder and that the ground is level and firm, free from moss, wet leaves, oil and is not on a shiny, slippery surface;
- ensure that it is not in an area that it can be pushed over by doors opening or passing traffic/people;
- is the ladder suitable for purposes i.e. is it long/high enough to do the task and strong and robust enough for the person’s height and weight;
- the ladder must be of aluminium construction, fitted with rubber feet and a Class 1 or BS EN 131 standard;
- the ladder must be checked before use on a daily basis to ensure:
  - there are no feet missing, worn, damaged or covered in dirt and that all the feet make good contact with the ground
  - there is no visual damage to any part of the ladder, and it is not bent, twisted, worn or damaged in any way
  - the steps or treads are not dirty or wet
  - the locking bars are engaged and are not worn or damaged in any way.

4.37 If there are any defects, or you are unsure, do not use the ladder and notify your H&S Contact or Project Manager immediately who will send it for repair or destruction if found not to be fit for use.

4.38 Once checked and the ladder is considered safe to use, the following steps must be adhered to:

- ensure 3 points of contact when climbing and whenever possible at the work position i.e. two feet and one hand must be on the ladder at all times. If both hands are required for the task, then the third point of contact can be knees or chest;
- do not overreach – ensure your navel stays in line with the stiles;
- only carry light materials;
- do not try to move or extend ladders while standing on the rungs;
- if using a leaning ladder then it must be secured or someone responsible must hold it in place to prevent it from slipping outwards or sideways;
- if an extension ladder is used for access/egress, then it should be secured and extended to at least 1 metre above the landing point to provide a secure handhold with a 1:4 width ratio. If used for access/egress then at least two people must be present, with one person staying at the ladder to secure it and ensure it does not get removed or knocked over.

4.39 Ladders within the offices are the responsibility of the H&S Contact however, prior to use the above checks must be carried out by a competent user. The ladders will be checked by the H&S Contact on a monthly basis as part of the monthly Housekeeping Checklist.

4.40 If a ladder is required for any task taking place outwith the office premises, or does not fit within the above parameters, then a risk assessment must first of all be completed for the task.
Provision and Use of Work Equipment Regulations 1998

4.41 It is our understanding of the Regulations that work equipment means any activity involving work equipment and includes, starting, stopping, programming, setting, transporting, repairing, modifying, maintaining, servicing and cleaning.

4.42 In order that we comply we have identified the following non-exhaustive list of work equipment, which are subject to the Regulations including:

- Ladders;
- motor vehicles;
- computers;
- guillotines and paper shredders;
- printers, photocopiers and plotters.

4.43 In selecting work equipment, we have taken regard to the working conditions and to the risks to the health and safety of our employees both in the workplace or anywhere else the work equipment is to be used. Risk assessments will be carried out for specialist equipment where necessary. In coming to a conclusion as to the suitability of equipment we have considered the following three aspects:

- its initial integrity;
- the place where it will be used;
- the purpose for which it will be used.

4.44 Equipment

- It is the responsibility of all employees to ensure that any equipment used is in good working safe order. Any defective equipment should be reported to the H&S Contact, a Principal or Line Manager. Employees should ask for training if not sure how to use any equipment.
- All equipment must be properly and safely stored when not in use.
- Employees are prohibited from using any piece of equipment for any purpose other than its intended purpose.
- Upper drawers of filing cabinets must not be overloaded, causing them to become top-heavy.
- At the end of each working day, non-essential appliances are to be switched off and their wall socket plug removed wherever practicable.
- Paper Guillotines are not to be operated with their guards removed.

Electrical Equipment

4.45 Direct or indirect contact with live parts can be fatal, cause shock or burns, this being the case all mains electrical equipment will be fitted with trips, RCD’s or other forms of swift cut off. Where possible battery powered tools or low voltage equipment will be used. Electrical wiring on LUC premises will be serviced and maintained by an experienced electrical contractor at least every five years. Portable equipment on LUC premises will be subject to portable appliance testing at regular intervals determined by risk assessment as follows:

- suitably experienced, qualified and experienced electricians or a vetted electrical contractor will be undertaking maintenance and repairs;
- all employees are expected to carry out visual inspections of any electrical equipment prior to the use in any office/site. If you see any loose connections, exposed wiring, defective cable sheathing or have any reason to suspect equipment or any circuit may not be safe, DO NOT USE the equipment concerned and report immediately to the H&S Contact or any manager.

Display Screen Equipment Regulations 1992

4.46 LUC carry out Assessments of all Display Screen Equipment Workstations to ensure that they comply with the above Regulations.

4.47 It is also our policy to carry out Assessments of persons using Display Screen Equipment under our control. The persons using the equipment are required to take part in a self-assessment exercise by completing a questionnaire and the results of the completed questionnaire will enable us to determine if they are a ‘user’ as defined by the Regulations. Employees will be made aware of the result of the assessment and if designated as a ‘user’ they will be made aware of their entitlements.

4.48 Also refer to LUC’s DSE Policy.

Driving

4.49 Any staff required to drive for work purposes must check with their H&S Contact in the first instance so that their documentation can be checked, and authorisation given. Advising staff of this will form part of the H&S Induction process. The H&S Contacts are responsible for checking driving licences via the DVLA online portal.

4.50 The Health & Safety Contacts will also ensure, as far as possible, that any vehicle driven for work purposes is covered by the appropriate vehicle insurance and has a valid MOT certificate. If driving their own vehicle, staff will be asked to
provide evidence of both insurance cover and MOT documentation to the H&S Contacts prior to use.

4.51 All staff will be reminded at least annually of the requirement to have their driving licences and driving documentation, if relevant, checked by the H&S Contacts prior to driving for work purposes.

4.52 Employees authorised to drive vehicles for work purposes are required to operate in accordance with LUC’s Travel Policy and any site risk assessment in place for the task. All drivers will be responsible for checking the vehicle prior to driving off.

4.53 LUC aims to protect all employees who drive on behalf of the Company from driving fatigue. No employee must drive their vehicle on Company business for more than three hours without a break of at least fifteen minutes. Employees must also not drive their vehicle for longer than eight hours in any twenty-four-hour period. These limits are absolute maximums.

LUC Owned Vehicles

4.54 Stringent checks are in place to ensure that any LUC owned vehicle is checked thoroughly prior to use and the above checks must be in place prior to any employee being authorised to drive the vehicle.

4.55 As well as checking the vehicle immediately before driving, weekly and monthly checks of the vehicle must be carried out which in turn will ensure that any servicing of the vehicle is carried out at appropriate times. Any defects must be reported immediately to the Director responsible for the vehicle.

4.56 The nominated Director responsible for any vehicle will check regularly to ensure that all the above checks are being carried out and the H&S Contacts will also carry out a visual check of the documentation when doing the monthly Housekeeping checklist.

Use of Hire Vehicles

4.57 LUC will use only reputable hire car companies with the account set up so that it is mandatory to include vehicle insurance cover with each hire.

4.58 All cars must be thoroughly checked by the driver at collection and prior to returning with any defects in hire vehicles being reported to their H&S Contact who will organise a replacement vehicle or repairs as appropriate.

Employee Owned Motor Vehicles

4.59 Employees authorised to use their own vehicle for LUC business are responsible for their own vehicles and must ensure that vehicles are roadworthy and insured for business use. Employees will be reimbursed a standard Inland Revenue mileage rate for authorised business miles.

Mobile Phones and Driving

4.60 LUC acknowledge that mobile phones can be an essential means of communication for employees working away from office premises and are an important asset in the event of an emergency.

4.61 It is an offence to use a mobile phone when driving. Drivers are therefore, in accordance with LUC’s Mobile Phone Policy, prohibited to use mobile phones whilst driving including where a ‘hands free’ device is used, unless parked with the vehicle engine switched off.

4.62 If it is essential that employees are contactable whilst driving, calls should be left to go to voicemail and regular stops made to pick up messages.

Control of Substances Hazardous to Health Regulations

4.63 To comply with the current Control of Substances Hazardous to Health Regulations 2002 (COSHH) as amended, an assessment has been carried out by the Company to identify all substances in use within the Company. Where necessary all Technical Data sheets have been obtained from the product Manufacturer or Supplier. Assessments have been carried out and the findings recorded in our COSHH Register, which is located in the Health and Safety File held by the H&S Contact in each office location and can also be viewed on the Health & Safety page of LUC’s Nest Portal site. Where necessary the information will be made known to all staff using the substances, and training will be given in a safe working method where appropriate. The H&S Contact will be responsible for ensuring compliance of the COSHH Regulations within their areas of responsibility.

4.64 It is the Company’s policy that all chemicals must:

- be kept in locked cupboards when not in use;
- be kept in original containers or suitable labelled receptacles, unless they have been diluted;
- disposed of in the correct manner using an approved hazardous waste carrier;
- all containers must be clearly labelled;
- all containers must be used according to manufacturer’s instructions.

4.65 It is our Policy that toxic substances will not be used within LUC’s operations or premises. Where necessary full training in the use of the safety equipment will be given to both
the operative and the supervisor. Employees must understand and strictly comply with the manufacturers’ instructions or safe systems of work.

4.66 Employees should wash their hands before and after handling chemicals and before and after smoking, eating or drinking.

4.67 It is an offence to pollute land and water ways with chemical waste. If accidental pollution should take place, then the employee must notify the H&S Contact without delay.

Asbestos

4.68 Asbestos may be found, in varying degrees, in buildings completed or refurbished prior to the early 1980’s although some asbestos was used as recently as 1999. The presence of asbestos will significantly influence proposed insulation or other maintenance, or refurbishment works, in terms of costs and disruption. If not properly identified at the outset the building owner may be in contravention of the Health and Safety at Work Act 1974 and the Control of Asbestos at Work Regulations 2012.

4.69 To comply with their legal responsibilities building owners should ensure that an asbestos register is prepared for all their properties and that this is reviewed and updated as alterations occur. The Asbestos Register should therefore be referred to before works are instructed. Failure to maintain current records will result in a breach of the Control of Asbestos at Work Regulations i.e. a duty to “keep and maintain an up-to-date record of the location, condition, maintenance and removal of all asbestos-containing materials on the premises”. A material risk assessment has been undertaken and is included in the Property Logbook along with the asbestos surveys and register for our Glasgow, Edinburgh, Bristol, Manchester and London premises.

4.70 The Asbestos Register and report will be made available to any of our employees and sub-contractors who may be liable to disturb any asbestos containing material detected during work.

4.71 As part of the responsibility to manage asbestos within a building all incidences of asbestos will be labelled.

4.72 A permit to work system will be implemented; this is designed to avoid the accidental damage to asbestos arising from maintenance activities.

4.73 Before working within properties, or on sites, the asbestos register will be requested from the client. Where work is to take place in close proximity to, or on, asbestos containing material, an assessment of the work will be carried out setting out the steps to prevent exposure or reduce it to its lowest level.

Employees going onto sites should:

- Ask whether there has been a check for asbestos where you are working.
- If there hasn’t been a check, treat any pipe lagging or insulation board etc. as asbestos.
- If you are uncertain how to carry on, stop work and seek advice from your supervisor.
- If in doubt, check it out (before proceeding any further).

Construction (Design and Management) Regulations 2015

4.74 It is a committed policy of LUC, and a duty upon all members of staff involved in projects to be conversant with the requirements of the Construction (Design and Management) (“CDM”) Regulations 2015.

4.75 If appointed by the client to undertake the role of Principal Designer, we will take control of the pre-construction phase of the project and will:

- plan, manage, monitor and coordinate health and safety in the pre-construction phase. In doing so we will take account of relevant information (such as an existing health and safety file) that might affect design work carried out both before and after the construction phase has started;
- help and advise the client in bringing together pre-construction information, and provide the information designers and contractors need to carry out their duties;
- work with any other designers on the project to eliminate foreseeable health and safety risks to anyone affected by the work and, where that is not possible, take steps to reduce or control those risks;
- ensure that everyone involved in the pre-construction phase communicates and cooperates, coordinating their work wherever required;
- liaise with the principal contractor, keeping them informed of any risks that need to be controlled during the construction phase;

4.76 If acting in the role of Designer, we will:

- make sure the client is aware of the client duties under CDM 2015 before starting any design work;
- when preparing or modifying designs:
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– take account of any pre-construction information provided by the client (and principal designer, if one is involved);
– eliminate foreseeable health and safety risks to anyone affected by the project (if possible);
– take steps to reduce or control any risks that cannot be eliminated.

◼ provide design information to:
– the principal designer (if involved), for inclusion in the pre-construction information and the health and safety file;
– the client and principal contractor (or the contractor for single contractor projects) to help them comply with their duties, such as ensuring a construction phase plan is prepared.

◼ communicate, cooperate and coordinate with:
– any other designers (including the principal designer) so that all designs are compatible and ensure health and safety, both during the project and beyond;
– all contractors (including the principal contractor), to take account of their knowledge and experience of building designs.

Visits to Sites for Operations under CDM Regulations etc.

4.77 When employees arrange to visit sites prior to commencement of projects for inspection or photographic purposes, this will be documented in the diary system, contact will be made with the office as pre-arranged and minimum intrusion onto the site will be made to enable the operation to be carried out. If photographs are taken from the highway, traffic conditions must be considered, and Hi-Viz clothing worn. When projects have commenced, arrangements will be made for site employees, normally the site agent or whomever they appoint, to accompany the member of employees on the site. The employees will obey instructions of the site agent and the site rules and regulations. If use of ladders is required staff will adhere to the relevant section of this policy. Welfare facilities will be risk assessed on a project to project basis and shall be, as a minimum:

◼ sanitary conveniences in sufficient numbers at locations which are readily accessible along with a supply of clean hot and cold water, soap and towels;
◼ barrier cream and cleaning agents will be provided where appropriate for example within changing facilities.

4.78 The above points have been highlighted due to the identification of these issues as being higher level of risk to the other aspects of the Regulations. However, this does not mean that all other aspects are not important, and they are addressed elsewhere in the policy document or in supplementary information sheets.

Workplace (Health, Safety and Welfare) Regulations 1992

4.79 These regulations apply within the office and to the CDM Regulations above. LUC will comply with the Regulations by ensuring that:

◼ workplaces, equipment, devices and systems are maintained in an efficient state and there is provision of sufficient quantity of fresh air;
◼ temperature will be maintained at least at 16 degrees c;
◼ suitable and sufficient lighting, including emergency lighting, will be provided for each work area;
◼ workplaces will be kept sufficiently clean;
◼ waste materials will be stored in designated areas;
◼ each person shall have sufficient floor area, height and unoccupied space;
◼ workstations will be arranged to suit both the person and the work;
◼ floors will be kept free from obstruction and substances that could cause slips, trips and falls;
◼ a risk assessment will be carried out where the risk to any employee could result in a fall; Any resulting procedures or the use of any Personal Protective Equipment shall be enforced;
◼ windows should be able to be opened and closed without risk to the employee, of safety material where necessary and the cleaning of windows should be carried out from the inside where possible;
◼ a Risk Assessment will be carried out to ensure that there is proper separation between pedestrians and vehicles where external traffic routes and car parks are within LUC control;
◼ a suitable number of conveniences have been provided and are adequately ventilated, lit and kept clean. Suitable and sufficient supplies are available and include a supply of clean hot and cold (or warm) water, soap, towels and an adequate supply of drinking water;
◼ suitable accommodation has been provided for non-working clothes and special clothing not taken home, and suitable changing facilities have been provided where necessary.
Working from Home

4.80 Where home working has been requested, it is essential that Line Managers consider the suitability of the home environment in terms of health and safety. The environment for home working must be safe, comfortable and practical for the work to be completed.

4.81 Workstations used at home on an agreed regular basis for LUC business must be assessed – whether or not the workstation is provided in whole or in part by the company. An initial assessment should be carried out by the user themselves using LUC’s DSE Assessment form which is then forwarded to their H&S Contact for review.

4.82 Where concerns have been raised, a more detailed assessment will be reviewed initially by the H&S Contact and then by a competent Assessor if required.

4.83 Where working at home is ad hoc, or in a situation where working at home is imposed, Line Managers will discuss the working arrangements so that it is in line with normal best working practice, as far as possible. Guidance is available to staff although no formal DSE Assessment is required.

Site Safety Induction Briefing

4.84 We believe in maintaining a safe place of work for you and your colleagues and because of this it is vital for you to understand that you also have a part to play in achieving the safety standards set by the management team during the period of the contract to its completion.

4.85 Failure to comply with the following Site Safety Rules will result in disciplinary action up to and including dismissal.

Site Safety Instructions

The following instructions must be adhered to at all times:

- Personal protective equipment issued must be worn at all times.
- Do not enter any site unless authorised to do so.
- Ensure that you fully understand the contents of Risk Assessment and Method Statements applicable to the tasks you are to perform. Employees must consult their project manager / line manager where there is any doubt or misunderstanding.
- LUC’s Personal Safety and Lone Working Policy must be adhered to at all times.

Falls are a major cause of serious injuries in the construction industry. It is essential therefore to adhere to the following guidelines:

- All ladders must be lashed or footed, regardless of the duration of the work.
- Only access scaffolding if authorised to do so by the site manager or scaffolding manager.
- Scaffold will be fully boarded with guardrails and toe-boards in position – do not work on incomplete scaffold.
- If you see unguarded areas report the matter to your Supervisor immediately.
- All injuries must be treated and then recorded in the site Accident Book and also LUC’s Accident Book.

In addition:

- Ensure that you are familiar with the Emergency arrangements appertaining at the site, i.e. dealing with injuries and outbreaks of fire.
- Prohibited drugs or alcohol are prohibited from site. Anyone found in possession or under the influence of drugs or alcohol will be instantly dismissed.
- It is essential that the site be kept in a clean and tidy condition by disposing of waste materials in the place provided and working materials should be stored away carefully and clear of walkways.
- When using materials always ask if a COSHH Assessment is in force. Use the material in accordance with the instructions and wear suitable personal protective equipment as directed.
- Always obey any instructions given by your management or Client’s management team. It is essential that you fully understand and adhere to all rules and regulations stipulated by the Client.
- Smoking – LUC operates a smoke free policy in the workplace, which includes vehicles, on site and in client’s premises.

Risk Assessments

4.86 Sufficient and suitable risk assessments are a requirement of the Management of Health and Safety at Work Regulations1999. These assessments will identify whether adequate precautions have been taken and what else, if anything is required to prevent harm. The aim is to make sure no one gets hurt or becomes ill.

4.87 Health and Safety can be managed effectively both in the office and on site by:

- identifying the hazards;
- evaluating and measuring the risk associated with the hazard;
- removing altogether, reducing or controlling the risks;
- educating all those whom are exposed to the risks;
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- having an active programme of implementation;
- monitoring and reviewing performance.

Hazards

4.88 A hazard is taken to mean anything that can cause harm, whether a substance, material or practice, to the Health and Safety or welfare of employees, clients, contractors, members of the public and others affected by that action (e.g. chemicals, electricity, working from ladders etc.).

Risks

4.89 A risk is the chance great or small, that someone will be harmed by the hazard.

Assessments

4.90 If a risk assessment is required, it must be completed and/or checked by either the H&S Contact, the Project Manager or any other competent person prior to the task being undertaken. In order that a consistent and uniform approach to risk assessment is undertaken, all LUC risk assessments will be completed in the 5x5 matrix style as below:

5x5 Hazard Matrix

4.91 The risk is equal to the likelihood of potential harm from a hazard occurring multiplied by the potential severity of that harm i.e. any resultant injury or adverse health effect, so

\[ R = L \times S \]

Table 4.1: 5x5 Hazard Matrix

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
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</thead>
<tbody>
<tr>
<td>1 – Negligible chance</td>
<td>1 – Slight (min, no lost time)</td>
<td>1 – 5 Acceptable risk</td>
</tr>
<tr>
<td>2 – Little chance but could happen</td>
<td>2 – Minor injury (under 7-day injury)</td>
<td>6 – 12 Additional controls required</td>
</tr>
<tr>
<td>3 – May happen</td>
<td>3 – More than 7-day injury/illness (RIDDOR)</td>
<td>13 – 18 Urgent attention required</td>
</tr>
<tr>
<td>4 – Likely to happen</td>
<td>4 – Chronic injury/illness</td>
<td>18 – 25 Unacceptable risk – cease activity</td>
</tr>
<tr>
<td>5 – Almost inevitable</td>
<td>5 – Terminal illness/fatality</td>
<td></td>
</tr>
</tbody>
</table>

4.92 This type of risk assessment will be used to identify any Occupational Health & Safety hazards associated with any routine or non-routine activities within LUC, whether within the office or out on site, and will take into account hazards created in the vicinity of the workplace by work-related activities under the control of LUC.

4.93 A risk assessment will also be used to identify any hazards and risks associated with any potential changes to LUC’s management system or activities prior to the introduction of any changes with the aim of reducing risks as much as possible.

4.94 Office risk assessments will be reviewed on at least on an annual basis unless there are any material changes to the office structure or work activities with the completed assessments being documented within our H&S Management System. A site risk assessment should be prepared prior to going on site and then further updated as and when any additional hazards are identified. Site risk assessments should be held on file with the associated project papers so they are readily available to the project team.

The Working Time Regulations 2003

4.95 LUC will ensure compliance of the above Regulations and will consult its employees in all matters where it is deemed to be necessary. Both parties will confirm any special arrangements, which may be agreed between management and any individual employee, in writing.

Health & Safety (Consultation with Employees) Regulations 1996

4.96 LUC will directly adhere to all necessary rules as noted in The Health and Safety (Consultation with Employees) Regulations and ensure that employees are informed of the following when necessary:

- any changes in work which may affect their Health and Safety;
- LUC will arrange for competent people to help satisfy Health and Safety laws legal requirements when the need arises. To this end they have noted Wilson Adrain Safety Management Ltd as a source of information elsewhere in this document;
information on the likely risk associated with their work and the precautions to be taken both to prevent and protect, and to respond if the risk arises when emergency procedures will be issued to all employees;
- planned Health and Safety Training, whether project specified or general;
- the Health and Safety consequences of introducing new technology.

All employees are reminded that they have a responsibility to make representations to the management on potential hazards, dangerous occurrences, general safety matters and when consulted by management on such matters.

Violence at Work – Policy and Guidelines

4.98 Violence at work takes many forms. It can include:
- verbal abuse, such as shouting, threats and insults;
- racial or sexual harassment or discrimination;
- physical attacks or bullying.

The company acknowledge that its employees directly deal with the public and may face aggressive or violent behaviour. It is therefore our concern that we protect our employees so far as is reasonably practicable from this possibility. Refer to LUC’s Violence at Work Policy and the Bullying and Harassment Policy located within LUC’s People Policies Basket on Nest.

Sexual and Other Harassment

4.100 LUC is an equal opportunities employer and part of ensuring we meet our requirements under the Equal Opportunities Acts and Health and Safety at Work Act 1974, is to ensure that all employees have equal respect for one another, work in harmony and accept that behaviour that they may find acceptable may not be regarded so by others. Anything that infringes this may be regarded as being misconduct and therefore a potentially dismissible offence. Racial discrimination, sexual harassment, bullying or harassing a fellow colleague is included in this category.

4.101 LUC is committed to the principles of fairness and dignity at work and regards any form of harassment as unacceptable behaviour and a clear breach of that commitment. Respect for individuals is a fundamental element of LUC’s work ethic.

4.102 Refer to LUC’s People Policies and procedures located within the Baskets on Nest for the following policies: Bullying and Harassment; Equality and Diversity and Drugs and Alcohol.

Stress at Work

4.103 LUC has conducted a corporate Stress Risk Assessment in line with the HSE Management Standards and identified measures to control risk and minimise impacts. The risk assessment includes both ongoing actions and activities, as well as future measures, to provide a working environment where the presence or effects of work-related stress can be reduced as far as possible, and individuals have the appropriate knowledge, skills and support to manage themselves and each other in their responses to stress both in the workplace and outside.

4.104 The Wellbeing Strategy takes a comprehensive view of Health and Wellbeing, addressing root causes as well as setting out a plan for the future development of LUC’s capability and facilities for promoting, maintaining and understanding good physical and mental health. The Wellbeing Policy includes a detailed section on stress covering management and individual responsibilities, information to increase understanding and practical guidance on recognising and addressing stress.

Audit Monitoring

4.105 Our Health & Safety Policy, which forms the basis for all our health and safety procedures, is reviewed annually and more frequently if changes are required, by our Director of Finance & Operations, along with our external H&S Specialist Advisors. At this annual review meeting we take into account any changes to working conditions or patterns, any near miss or accidents that may have taken place and also any changes to policy legislation. Once the policy has been reviewed and any amendments made, it is then submitted to our Board of Directors for approval and final sign off.

4.106 Internal audits of LUC’s Health & Safety systems and procedures will be carried out on a regular basis by the Director of Finance & Operations with the assistance of the H&S Contacts for each office. Our external advisors will conduct an external audit of the systems and procedures within our Health and Safety Business Management System on an annual basis, following which an annual management review paper will be prepared. This management review will form the basis of the Health & Safety Management Plan and Health & Safety Training Matrix for the following year which will be agreed and approved by our Board of Directors. Our H&S Contacts will have the responsibility for ensuring that the management plan and training plan actions are carried out during the agreed timescales.

4.107 Our Human Resources Management Group is dedicated to ensuring health and safety performance is monitored. All aspects of health and safety that may have arisen during that period are discussed at their monthly
meetings to ensure that they have been dealt with appropriately and any actions have been taken or measures have been put in place to try and ensure that we have as safe a working environment as possible. Anything resulting from this is also reviewed by our Board Directors at their monthly meetings.

4.108 Any accident or near miss that occurs, whether in the office or on site, must be reported to the H&S Contact who will ensure that the details are recorded in the Accident Book, Accident Log and a follow up Accident Report carried out. Any findings or actions are dealt with at that time to ensure the accident/near miss does not re-occur.

4.109 Each office also updates their Office Risk Assessment and Fire Risk Assessments on an annual basis or sooner if required and any resulting risk assessments or actions identified are dealt with at that time.

4.110 Our employment policies, including various policies covering health and safety aspects such as personal safety and lone working, driving, training & development, stress at work etc. are reviewed by our HR Manager and/or H&S Contacts on an annual basis or, as and when required, to ensure that they comply with current legislation and fit with our current working practices.

Caring for the Environment

4.111 LUC recognises that its activities impact upon the environment both through its routine internal and external operations and through its influence and effects on the wider community. With sustainable environmental solutions being at the heart of LUC’s professional activities and culture, LUC acknowledges a responsibility for, and a commitment to, protection of the environment at all levels.

Commitment

4.112 LUC has a strong commitment to natural resource protection and environmentally sustainable in-house working practices and will take full account of its environmental impact in all its day to day activities. LUC’s commitment to the Environment is outlined as follows:

- to care for the Environment as a primary responsibility;
- to commit to achieving continuous improvement of our Environmental Performance;
- to contribute wherever possible to sustainable development;
- to support our Clients’ objectives in caring for the Environment and encourage their improvement.

Objectives

4.113 LUC will meet and where possible exceed any statutory and regulatory environmental requirements. Our environmental corporate objectives are:

- to significantly reduce energy consumption as part of LUC's pro-active facilities management programme with the goal of achieving carbon neutrality through year on year carbon reductions per capita;
- to reduce internal business travel through teleconferencing and video conferencing where possible and ensure that client-based business travel makes optimum use of public transport links and continue to encourage and facilitate sustainable travel among employees;
- to continue to focus on resource efficiency including water and waste minimisation in the workplace;
- to continue to ensure that office supplies are procured from environmentally sustainable and socially responsible sources and recycled and/or disposed of in accordance with regulatory requirements and best practice guidelines;
- to ensure that all contractual arrangements with third parties are in line with LUC's sustainable and socially responsible approach to projects through communication of our environmental statement;
- to continue to raise awareness and where possible address the sustainability impact of the design and specification of materials procured in relation to delivery of LUC client projects through implementation of our Sustainability Checklist;
- to work with other local, national and other organisations as appropriate to promote environmental awareness and to encourage a positive attitude to the local environment from individuals, groups and organisations.