

Health and Safety Policy

Originator:	Policy and Strategy Team
Executive Management Team Approval Date:	July 2020
Review date:	July 2021

1	Health and Safety Policy Statement
1.1	<p>The management of OVH recognises that:</p> <ul style="list-style-type: none"> • It has a legal duty of care towards protecting the health and safety of its employees and others who may be affected by OVH’s activities, and that managing health and safety is a business critical function
1.2	<p>In order to discharge its responsibilities the management will:</p> <ul style="list-style-type: none"> • Provide an organisational structure that defines the responsibilities for health and safety • Regularly monitor performance and revise policies and procedures to pursue a programme of continuous improvement • Provide adequate resources to control the health and safety risks arising from our work activities • Encourage staff to identify and report hazards so that we can all contribute towards improving safety • Communicate and consult with our employees on matters affecting their health and safety • Maintain our premises and provide and maintain safe plant and equipment • Provide information, instruction and supervision for employees • Provide adequate training and ensure that all employees are competent to do their tasks • Carry out and regularly review risk assessments to identify proportionate and pragmatic solutions to reducing risk • Eliminate risk through selection and design of buildings, facilities, equipment and processes. Where risks cannot be eliminated they will be minimised by the use of physical controls or, as a last resort, through systems of work and personal protection • Only engage contractors who are able to demonstrate due regard to health and safety matters • Bring this Policy Statement to the attention of all employees.
1.3	<p>The Health and Safety Policy will be reviewed at least annually and revised as necessary to reflect changes to the business activities and any changes to legislation. Any changes to the Policy will be brought to the attention of all employees.</p>

Signed:



Date: 14th July 2020

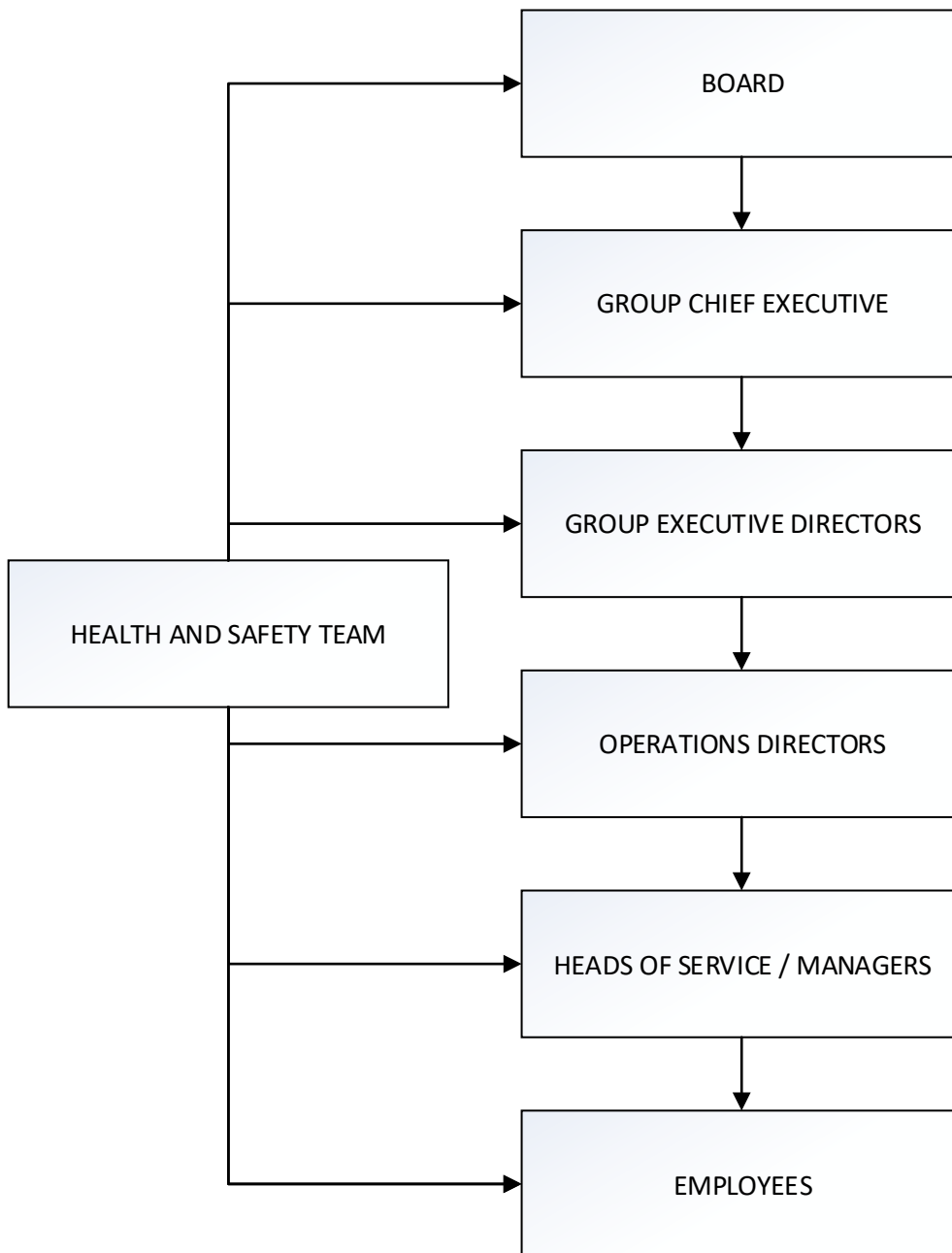
Roy Williams
Group Chief Executive Officer

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OVH Health and Safety Organisational Charts

2.1

Organisation Chart for the Management of Health and Safety



2.2

The overall responsibility for health and safety rests at the highest management level. However, it is the responsibility of every employee to co-operate in providing and maintaining a safe place of work.

2.3	This part of our Policy allocates responsibilities and provides a clear understanding of individuals' areas of accountability.
2.4	<u>Health and Safety Responsibilities</u>
2.4.1	Group Chief Executive
2.4.1.1	The Group Chief Executive has overall responsibility for ensuring our compliance with Health and Safety legislation but delegates the responsibility for implementation to the Group Executive Directors
2.4.1.2	<p>The Group Chief Executive will ensure that:</p> <ul style="list-style-type: none"> • Our Health and Safety Policy is implemented, monitored, developed, communicated effectively, reviewed and amended as required • A health and safety plan of continuous improvement is created and that senior management monitor progress against agreed targets • Suitable and sufficient funds, people, materials and equipment are provided to meet all health and safety requirements • Adequate insurance cover is provided and renewed • Senior management designated with health and safety responsibilities are provided with support to enable health and safety objectives to be met • A positive health and safety culture is promoted and that senior management develop a pro-active safety culture which will permeate into all activities undertaken and reach all personnel • A system of communication and consultation with employees is established • Effective training programmes have been put in to place • An annual report on the safety performance of OVH is presented to the Board
2.4.2	Group Executive Directors
2.4.2.1	<p>The Group Executive Directors are the designated persons with overall responsibility for ensuring our compliance with Health and Safety legislation. They will ensure that:</p> <ul style="list-style-type: none"> • Our Health and Safety Policy is implemented, monitored, developed, communicated effectively, reviewed and amended as required • A health and safety plan of continuous improvement is created and progress monitored • Competent persons are appointed to provide health and safety assistance and advice • An adequate system of maintenance exists and operates to keep premises, plant and work equipment in a safe condition • Statutory examinations are planned, completed and recorded • There is regular communication and consultation with staff on health and safety issues • an effective training programme is established to ensure staff are competent to carry out their work in a safe manner • Safe systems of work are developed and implemented • Accidents, ill health and 'near miss' incidents at work are recorded, investigated and reported • Safety issues raised are thoroughly investigated and, when necessary, further effective controls implemented and communicated to staff • Contractors engaged are competent, can demonstrate a good health and safety record and are made aware of relevant local health and safety rules and procedures

- Effective contingency plans are in place with a designated competent person in charge of the planning and control measures for situations involving imminent danger
- Health and safety objectives are set and their achievement is measured and reported in the annual report

2.4.3

Operations Directors

2.4.3.1

The Operations Directors will ensure that in their areas of control:

- They actively lead the implementation of our Health and Safety Policy
- They monitor their staff to ensure that they work safely, arrange increased supervision for new and young workers
- Safe systems of work are developed and implemented
- Risk assessments are completed, recorded and regularly reviewed
- Accidents, ill health and 'near miss' incidents at work are investigated, recorded and reported
- They communicate and consult with staff on health and safety issues
- They encourage staff to report hazards and raise health and safety concerns
- Safety training for staff is identified, undertaken and recorded to ensure staff are competent to carry out their work in a safe manner
- Issues concerning safety raised by anyone are thoroughly investigated and, when necessary, further effective controls implemented
- Premises, plant and work equipment are maintained in a safe condition
- Statutory examinations are planned, completed and recorded
- Personal protective equipment is provided, staff instructed in its use and that records are kept
- Adequate arrangements for fire and first aid are established
- Any safety issues that cannot be dealt with are referred to the Health and Safety Team for action
- Welfare facilities provided are maintained in a satisfactory state
- Health surveillance is carried out and records are kept
- Contractors engaged are competent, can demonstrate a good health and safety record and are made aware of relevant local health and safety rules and procedures
- Health and safety notices are displayed
- Agreed safety standards are maintained particularly those relating to housekeeping
- health and safety rules are followed by all

2.4.4

Heads of Service / Managers

2.4.4.1

The Heads of Service / Managers will ensure that in their areas of control:

- They implement our Health and Safety Policy
- They supervise their staff to ensure that they work safely, providing increased supervision for new and young workers
- They communicate and consult with staff on health and safety issues
- Health and safety rules are followed by all
- They encourage staff to report hazards and raise health and safety concerns
- Issues concerning safety raised by anyone are thoroughly investigated and, when necessary, further effective controls implemented and communicated to staff

- Any safety issues that cannot be dealt with are referred to the Health and Safety Team for action
- Safety training for staff is identified, undertaken and recorded to ensure they are competent to carry out their work in a safe manner
- Safe systems of work are developed and implemented
- Accidents, ill health and 'near miss' incidents at work are recorded, investigated and reported
- Personal protective equipment is readily available and maintained, and relevant staff are aware of the correct use of this and the procedures for replacement
- Hazardous substances are stored, transported, handled and used in a safe manner according to manufacturers' instructions and established rules and procedures.
- Risk assessments are completed, recorded and regularly reviewed, with any changes being brought to the attention of staff who may be affected
- Contractors engaged are competent, can demonstrate a good health and safety record and are made aware of relevant local health and safety rules and procedures
- Health and safety notices are displayed
- Agreed safety standards are maintained particularly those relating to housekeeping

2.4.5 **Health and Safety Team**

2.4.5.1 The Health and Safety Team will ensure that:

- Management are advised of relevant changes in health and safety legislation, codes of practice and industry standards
- Risk assessment requirements are co-ordinated and the implementation of any action required is monitored
- Risk assessments are reviewed regularly and any changes are brought to the attention of staff who may be affected
- Regular meetings are held where health and safety issues can be discussed, progress made against objectives and plans monitored and actions decided
- Provide advice on health and safety training requirements
- Details of accidents, dangerous occurrences or diseases that are notifiable are reported to the Enforcing Authorities
- Assist in investigating and recording accident investigations
- Contact with external organisations such as the emergency services is co-ordinated
- Health assessment requirements are identified and advised to management
- The schedule of statutory examinations of plant and equipment is maintained and managers are made aware of impending examinations

2.4.6 **Employees**

2.4.6.1 All employees must:

- Take reasonable care of their own safety
- Take reasonable care of the safety of others affected by their actions
- Observe the safety rules
- Comply with the Health and Safety policy
- Conform to all written or verbal instructions given to them to ensure their personal safety and the safety of others
- Dress sensibly and safely for their particular working environment or occupation

- Conduct themselves in an orderly manner in the work place and refrain from any antics or pranks
- Use all safety equipment and/or protective clothing as directed
- Avoid any improvisations of any form which could create an unnecessary risk to their personal safety and the safety of others
- Maintain all equipment in good condition and report defects to their supervisor
- report any safety hazard or malfunction of any item of plant or equipment to their supervisor
- Report all accidents to their supervisor whether an injury is sustained or not
- Attend as requested any health and safety training course
- Observe all laid down procedures for processes, materials and substances used
- Observe the fire evacuation procedure and the position of all fire equipment and fire exit routes.

2.4.7 **Health and Safety Committee**

2.4.7.1 The Health and Safety Committee's responsibility is to facilitate communication and consultation on health and safety issues across the organisation. They are responsible for ensuring that:

- There is regular communication and consultation with staff on health and safety issues
- Health and safety issues raised by employees are discussed and considered for action
- Health and safety performance and standards are monitored
- Trends in accident statistics across the organisation are identified and making recommendations for action
- Health and safety is promoted and new initiatives are considered to progressively improve standards in all areas
- Employees are aware of significant changes to our health and safety policy documentation

2.4.8 **Board**

2.4.8.1 The Board is responsible for determining policies on Health and Safety and Welfare, for ensuring that they are regularly reviewed and active monitoring systems are in place to gauge performance in respect of Health and Safety.

2.4.8.2 Policies and procedures will be developed to ensure that employees and others affected by our operations are not exposed to unnecessary risks and that adequate control measures are in place to reduce any risks as far as is reasonably practicable.

2.4.8.3 The Board will establish effective 'downward' communication systems and management structures to ensure all persons are aware of their roles and responsibilities in respect of health and safety legislation, rules and best practice.

2.4.8.4 The Board will ensure integration of good health and safety management with business decisions.

3**OVH Health and Safety Arrangements**

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3.2 Statement of Intent

3.2.1 OVH views that health and safety of its staff, customers, contractors and users of its buildings and services are of paramount importance.

3.2.2	OVH will ensure that all reasonable measures are in place to mitigate risks that are present from health and safety hazards through a system of checks and risk assessments.
3.2.3	OVH will ensure that all staff and others that have a management responsibilities to meet health and safety requirements at all times.
3.2.4	In operating this Policy, OVH will demonstrate compliance with the principal UK legislation in health and safety, namely but not exclusively, 'The Health and Safety at Work Act 1974' (as amended) and the 'Corporate Manslaughter and Corporate Homicide Act 2007 (as amended) and any supporting Regulations, as applicable.
3.3	Accident Recording, Reporting and Investigation
3.3.1	This policy sets out the procedures that are to be followed when any employee, visitor or contractor has an accident, near miss or dangerous occurrence on OVH premises during the course of their employment. This will also apply to visitors who are members of the public and are therefore not at work.
3.3.2	Definitions
3.3.2.1	An accident is an unplanned event that causes injury to persons, damage to property or a combination of both.
3.3.2.2	A near miss is an unplanned event that does not cause injury or damage but could do so.
3.3.3	Accident/Incident Report Form
3.3.3.1	All accidents must be recorded using an Accident/Incident Report Form.
3.3.3.2	Accident/Incident Report Forms will be reviewed by the Health and Safety Team to ascertain the nature of incidents that have occurred in the workplace. This review will be in addition to any investigation of the circumstances surrounding each incident.
3.3.3.3	All near misses must also be reported as soon as possible so that action can be taken to investigate the causes and to prevent recurrence.
3.3.3.4	Employees must ensure that they are aware of the location and/or how to access the Accident/Incident Report Form.
3.3.4	Reporting Accidents
3.3.4.1	Certain accidents causing injury, both fatal and non-fatal, certain occupational diseases and certain dangerous occurrences are reportable to the Enforcing Authority under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).
3.3.4.2	All incidents can be reported online.
3.3.4.3	A telephone service is in place for reporting fatal and major injuries <u>only</u> – see below.
3.3.4.3	Fatalities or major injuries must be reported to the enforcing authority without delay.

3.3.4.4	Injuries that lead to an employee being incapacitated for more than seven consecutive days as the result of an occupational accident or injury (not counting the day of the accident but including weekends and rest days) the report must be notified within 15 days of the accident/incident using the appropriate online form.
3.3.4.5	Cases of disease should be reported as soon as notification is received by a doctor that an employee suffers from a reportable work-related disease using the online form.
3.3.4.6	For further advice on injuries, diseases or dangerous occurrences requiring notification please contact the Health and Safety Team at www.hse.gov.uk
3.3.4.7	The completed report form should be kept with other accident records and documents on the accident investigation. They will be kept to advise the insurers of a potential claim and to present to the Enforcing Authority in the event of an investigation.
3.3.4.8	Records are to be kept for 3 years from the date of the incident.
3.3.4.9	Investigation
3.3.4.10	<p>All injury related accidents that are either notified to the Enforcing Authority or where a serious injury has occurred will be investigated:</p> <ul style="list-style-type: none"> • To ensure that all necessary information in respect of the accident or incident is collated • To understand the sequence of events that led to the accident or incident • To identify the unsafe acts and conditions that contributed to the cause of the accident or incident • To identify the underlying causes that may have contributed to the accident or incident • To ensure that effective remedial actions are taken to prevent any recurrence • To enable a full and comprehensive report of the accident or incident to be prepared and circulated to all interested parties • To enable all statutory requirements to be adhered to
3.3.4.11	The investigation will include obtaining signed witness statements, photographs and drawings as appropriate.
3.4	<u>Asbestos</u>
3.4.1.1	OVH will protect employees and other persons potentially exposed to asbestos as far as is reasonably practicable. This will be achieved by minimising exposure through the management of asbestos-containing materials within OVH premises.
3.4.1.2	Everyone who needs to know about the presence of asbestos will be alerted (including notification via employee job sheets). No one will be allowed to start work that could disturb asbestos unless the correct procedures are to be employed.

3.4.2	Assessment
3.4.2.1	The premises will be surveyed to determine whether asbestos-containing materials are present. It will be presumed that materials contain asbestos unless there is strong evidence to the contrary.
3.4.2.2	The amount and condition of the asbestos-containing material will be assessed and measures will be identified to ensure that airborne asbestos fibres are not present or formed in the workplace.
3.4.3	A Written Plan
3.4.3.1	A written plan or register that sets out the location of the asbestos-containing material and how the risk from this material will be managed and steps taken to put the plan into action. The plan or register will be made available and the arrangements will be reviewed at regular intervals or when there has been a significant change to the organisation or any of the personnel within its partners.
3.4.4	Access to Asbestos-containing Materials
3.4.4.1	Access to asbestos-containing materials in the premises will be controlled so as to prevent inadvertent disturbance of the material and the release of asbestos fibres. Systems will be put in place to ensure that anyone liable to disturb asbestos-containing materials is made aware of their location.
3.4.5	Monitoring and Maintenance
3.4.5.1	The condition of all asbestos-containing materials or materials suspected of containing asbestos will be inspected at agreed intervals to ascertain that there has been no damage or deterioration. Where damage or deterioration is found the asbestos-containing material will be reassessed and repaired or removed as appropriate.
3.4.6	Asbestos-related Emergencies
3.4.6.1	Procedures to deal with asbestos-related incidents will be in place (including the provision of information and warning systems) unless there is only a slight risk to the health of employees.
3.4.7	Arrangements for Controlling Work on Asbestos
3.4.7.1	Any work on, or removal of, asbestos-containing materials will be controlled to ensure that adequate precautions are taken to prevent the release of asbestos fibres.
3.4.7.2	Work with asbestos and asbestos-containing materials is to be carried out by a licensed contractor (licensed by the HSE) unless the work is exempted from the requirement for licensing.

3.4.8	<p>Selection and Control of Contractors to Work on Asbestos-containing Materials</p>
3.4.8.1	<p>When contractors are engaged to work on the premises, adequate steps will be taken to ensure the contractors are competent and have sufficient skills and knowledge to do the job safely and without risks to health.</p>
3.4.8.2	<p>Only contractors licensed by the HSE will be used for the removal of asbestos-containing materials, unless the work involves the removal of materials in which:</p> <ul style="list-style-type: none"> • asbestos fibres are firmly linked in a matrix • the exposure during the removal process is likely to be sporadic or of low intensity
3.4.8.3	<p>Contractors hired to carry out building or allied trade work that will involve minor work with asbestos must comply with the Control of Asbestos at Work Regulations.</p>
3.4.9	<p>Procedures for Dealing with Health and Safety Issues</p>
3.4.9.1	<p>Where an employee raises a health and safety problem related to work with asbestos, OVH will:</p> <ul style="list-style-type: none"> • Take all necessary steps to investigate the circumstances • Take corrective measures where appropriate • Advise the employee of actions taken
3.4.9.2	<p>Where a problem arises relating to the condition of, or during work on, asbestos-containing material, the employee must:</p> <ul style="list-style-type: none"> • Inform a responsible person immediately, usually a supervisor or manager • In the case of an accident or emergency, respond quickly to ensure effective treatment
3.4.10	<p>Communication and Consultation</p>
3.4.10.1	<p>It is a legal requirement for OVH to establish arrangements to communicate and consult with employees on issues affecting their health and safety and to take account of their views.</p>
3.4.10.2	<p>To achieve this objective we will:</p> <ul style="list-style-type: none"> • Establish effective lines of communication • Involve and consult with employees through: <ul style="list-style-type: none"> ○ Individual conversations ○ Notice boards ○ Internal publications ○ Staff meetings ○ Health and safety meetings ○ Employee representative meetings • Display the 'Health and Safety Law – What You Should Know' poster • Consult with employees when changes to processes, equipment, work methods etc. are to be introduced that may affect their health and safety

3.5	<u>Confined Spaces</u>
3.5.1.1	OVH will take all reasonable steps to secure the health and safety of employees and/or contractors, who are required to enter into confined spaces.
3.5.1.2	Information and Training
3.5.1.3	OVH will provide sufficient information, instruction and training as is necessary to ensure the health and safety of workers who are required to enter into confined spaces
3.5.1.4	Managers and supervisors who are responsible for workers required to enter confined spaces will also be given appropriate training
3.6	<u>Contractors</u>
3.6.1	When working on our premises it is considered that contractors are joint occupiers for that period and therefore we have both joint liabilities in “common areas”. In order to meet our legal obligations with regard to contractors we will ensure that prior to engaging any contractor they are competent and that any works are carried out safely.
3.6.2	<p>The following factors will be considered as part of our procedures for vetting contractors:</p> <ul style="list-style-type: none"> • Sight of the contractor’s own safety policy, risk assessments, method statements, permits to work, etc. as applicable • Clarification of the responsibility for provision of first aid and fire extinguishing equipment • Details of articles and hazardous substances intended to be brought to site, including any arrangements for safe transportation, handling, use, storage and disposal • Details of plant and equipment to be brought onto site, including arrangements for storage, use, maintenance and inspection • Clarification for supervision and regular communication during work including arrangements for reporting problems or stopping work in cases where there is a serious risk of personal injury • Confirmation that all workers are suitably qualified and competent for the work (including a requirement for sight of evidence where relevant) • Evidence showing that appropriate Employers and Public Liability Insurance is in place
3.6.3	Clearly, it will not be necessary to go to such elaborate lengths where the contract is very short and will not create hazards of any significance. The complexity of the arrangements will be directly proportional to the risks and consequences of failure.
3.6.4	Similarly we have a parallel duty to the contractor and must ensure that the contractor is not put at risk by our own activities for the duration of the contract.
3.6.5	We will stop contractors working immediately if their work appears unsafe. Staff should report any concerns to a manager/supervisor immediately.

3.7	<u>Construction work and the Construction (Design and Management) Regulations</u>
3.7.1	OVH will ensure all construction work carried out is subject to the Construction (Design and Management) Regulations.
3.7.2	<p>We will apply key elements to secure construction health and safety, these include:</p> <ul style="list-style-type: none"> a) Managing the risks by applying the general principles of prevention; b) Appointing the right people and organisations at the right time; c) Making sure everyone has the information, instruction, training and supervision they need to carry out their jobs in a way that secures health and safety; d) Duty holders cooperating and communicating with each other and coordinating their work; e) Consulting workers and engaging with them to promote and develop effective measures to secure health, safety and welfare
3.7.3	<p>We will ensure construction work is notified to the HSE when work:</p> <ul style="list-style-type: none"> • Lasts longer than 30 working days and has more than 20 workers working simultaneously at any point in the project; or • Exceeds 500 person days
3.7.4	Summary of roles and main duties:
3.7.4.1	Client:
3.7.4.2	<p>Clients are organisations or individuals for whom a construction project is carried out.</p> <ul style="list-style-type: none"> • Make suitable arrangements for managing a project. This includes making sure: <ul style="list-style-type: none"> ○ Other duty holders are appointed; ○ Sufficient time and resources are allocated • Make sure: <ul style="list-style-type: none"> ○ Relevant information is prepared and provided to other duty holders; ○ The principal designer and principal contractor carry out their duties; ○ Welfare facilities are provided
3.7.5	Principal Designer
3.7.5.1	<p>Principal designers are designers appointed by the client in projects involving more than one contractor. They can be an organisation or an individual with sufficient knowledge, experience and ability to carry out the role, plan, manage, monitor and coordinate health and safety in the pre-construction phase of a project. This includes:</p> <ul style="list-style-type: none"> • Identifying, eliminating or controlling foreseeable risks; • Ensuring designers carry out their duties • Prepare and provide relevant information to other duty holders. • Provide relevant information to the principal contractor to help them plan, manage, monitor and coordinate health and safety in the construction phase.

3.7.6	Principal Contractor:
3.7.6.1	Principal contractors are contractors appointed by the client to coordinate the construction phase of a project where it involves more than one contractor.
3.7.6.2	Plan, manage, monitor and coordinate health and safety in the construction phase of a project. This includes:
	<ul style="list-style-type: none"> • Liaising with the client and principal designer; • Preparing the construction phase plan; • Organising cooperation between contractors and coordinating their work
3.7.6.3	Ensure:
	<ul style="list-style-type: none"> • Suitable site inductions are provided; • Reasonable steps are taken to prevent unauthorised access; • Workers are consulted and engaged in securing their health and safety; and • Welfare facilities are provided
3.7.7	Contractors:
3.7.7.1	Contractors are those who do the actual construction work and can be either an individual or a company.
3.7.7.2	Plan, manage and monitor construction work under their control so that it is carried out without risks to health and safety.
3.7.7.3	For projects involving more than one contractor, coordinate their activities with others in the project team – in particular, comply with directions given to them by the principal designer or principal contractor.
3.7.7.4	For single-contractor projects, prepare a construction phase plan.
3.7.8	Designers:
3.7.8.1	Designers are those, who as part of a business, prepare or modify designs for a building, product or system relating to construction work.
3.7.8.2	When preparing or modifying designs, to eliminate, reduce or control foreseeable risks that may arise during:
	<ul style="list-style-type: none"> • Construction; and • The maintenance and use of a building once it is built
3.7.8.3	Provide information to other members of the project team to help them fulfil their duties.
3.7.9	Workers:
3.7.9.1	Workers are the people who work for or under the control of contractors on a construction site.

3.7.9.2

They must:

- Be consulted about matters which affect their health, safety and welfare;
- Take care of their own health and safety and others who may be affected by their actions;
- Report anything they see which is likely to endanger either their own or others' health and safety;
- Cooperate with their employer, fellow workers, contractors and other duty holders

3.8

Disabled Workers

3.8.1.1

OVH will give full and proper consideration to the needs of disabled employees and visitors.

3.8.1.2

To achieve this OVH will:

- Treat all disabled employees and visitors with respect and dignity, both in the provision of a safe working environment and in equal access to OVH's facilities
- Ensure that risk assessments are undertaken of the special needs of the disabled and carry out reasonable adjustments to the premises and/or employment arrangements
- Encourage employees with special needs to suggest any premises or task improvements to their line managers
- Discipline any employees found treating their disabled colleagues with less than the expected standards of respect and dignity
- In a fire or bomb threat evacuation, expect other employees to help disabled people to leave the premises swiftly

3.9

Display Screen Equipment

3.9.1

All reasonable steps will be taken by OVH to secure the health and safety of employees who work with display screen equipment.

3.9.2

To achieve this objective OVH will:

- carry out an assessment of each workstation
- implement necessary measures to remedy any risks found as a result of the assessment
- provide adequate information and training to persons working with display screen equipment
- endeavour to incorporate changes of task within the working day, to prevent intensive periods of on-screen activity
- review software to ensure that it is suitable for the task and is not unnecessarily complicated
- arrange for the provision of free eye tests prior to employment, at regular intervals thereafter and where a visual problem is experienced
- arrange for the supply, free of charge, of any corrective appliances (glasses or contact lenses) where these are required specifically for working with display screen equipment
- advise existing employees, and all persons applying for work with display screen equipment, of the risks to health and how these are to be avoided
- investigate any discomfort or ill health believed to be associated with the use of display screen equipment and take appropriate remedial action

- make special arrangements for individuals with health conditions that could be adversely affected by working with display screen equipment

3.9.3

Employees must:

- comply with the instructions and training given regarding safe workstation set-up and use, including the need for regular changes of activity or breaks and the use of the equipment provided
- inform their departmental supervisor/line manager of any disability or health condition which may affect their ability to work using display screen equipment or be affected by working with DSE (this information will be treated confidentially)
- report to their departmental supervisor/line manager any discomfort or health concern believed to be associated with the use of DSE (this information will be treated confidentially)

3.10

Drugs and Alcohol

3.10.1

Employees must not drink alcohol on OVH's premises or the premises of its customers or clients.

3.10.2

Any employee who is found consuming alcohol on OVH's premises or the premises of its customers and clients or is found to be intoxicated at work will normally face disciplinary action on the ground of gross misconduct under OVH's disciplinary procedure.

3.10.3

Existing and prospective employees may be asked to undergo a medical examination, which will seek to determine whether he/she has taken a controlled drug or has an alcohol abuse problem.

3.10.4

A refusal to give consent to such an examination or a refusal to undergo the screening will result in the immediate withdrawal of any offer made to prospective employees and will normally be treated as gross misconduct for employees.

3.10.5

The possession, use or distribution of drugs for non-medical purposes on OVH's premises is strictly forbidden and a gross misconduct offence.

3.10.6

If you are prescribed drugs by your doctor which may affect your ability to perform your work you should discuss the problem with your manager or supervisor.

3.10.7

If OVH suspects there has been a breach of this policy or your work performance or conduct has been impaired through substance abuse, OVH reserves the right to require you to undergo a medical examination to determine the cause of the problem.

3.10.8

If you refuse to undergo a medical examination in such circumstances your refusal will normally be treated as gross misconduct.

3.10.9

If, having undergone a medical examination, it is confirmed that you have been positively tested for a controlled drug, or you admit there is a problem, OVH reserves the right to suspend you from your employment (with or without pay) to allow OVH to decide whether to deal with the matter under the terms of OVH's disciplinary procedure and/or to require you to undergo treatment and rehabilitation.

3.10.10 OVH reserves the right to search you or any of your property held on Company premises at any time if there are reasonable grounds to believe that this policy is being or has been infringed or for any other reason. If you refuse to comply with these search procedures, your refusal will normally be treated as gross misconduct.

3.10.11 OVH reserves the right to inform the police of any suspicions it may have with regard to the use of controlled drugs by its employees on OVH's premises.

3.11 **Electricity**

3.11.1 All reasonable steps will be taken to secure the health and safety of employees who use, operate or maintain electrical equipment.

3.11.2 To ensure this objective OVH will:

- Ensure electrical installations and equipment are installed in accordance with IEE Wiring Regulations
- Maintain the fixed installation in a safe condition by carrying out routine safety tests
- Inspect and test portable and transportable equipment as often as required to ensure safety
- Promote and implement a safe system of work for maintenance, inspection and testing
- Forbid live working unless absolutely necessary, in which case a permit must be issued
- Ensure employees who carry out electrical work are competent to do so
- Maintain detailed records

3.11.3 Employees must:

- Visually check electrical equipment for damage before use
- Report any defects found to their line manager/supervisor
- Not use defective electrical equipment
- Not carry out any repair to any electrical item unless qualified to do so
- Switch off equipment from the mains when left unattended for long periods
- Not bring any electrical item onto OVH premises until it has been tested and a record of such a test has been included in the appropriate record (NB: Employees must notify their manager/supervisor of equipment requiring a test)
- Not leave electric cables in such a position that they will cause a tripping hazard or be subject to mechanical damage

3.12 **Fire**

3.12.1 All reasonable steps will be taken to prevent a fire occurring. In the event of fire, the safety of life will override all other considerations, such as saving property and extinguishing the fire.

3.12.2 In order to prevent fire and to minimise the likelihood of injury in the event of a fire OVH will:

- Assess the risk from fire at our premises and implement appropriate control measures

- Ensure good housekeeping standards are maintained to minimise the risk of fire
- Provide and maintain safe means of escape from the premises
- Develop a fire evacuation procedure for all buildings
- Provide and maintain appropriate fire fighting equipment
- Regularly stage fire evacuation drills, inspect the means of escape and test and inspect fire-fighting equipment and any fire warning systems
- Provide adequate fire safety training to employees, plus specialist training to those with special responsibilities
- Make arrangements for the safe evacuation of deaf or otherwise disabled persons
- Make arrangements for ensuring all visitors are made aware of the fire evacuation procedures
- Display fire action notices
- Keep fire safety records

3.12.3 OVH does not require persons to attempt to extinguish a fire but extinguishing action may be taken if it is safe to do so.

3.12.4 Immediate evacuation of the building must take place as soon as the evacuate signal is given. All occupants, on evacuation, should report to the pre-determined assembly points.

3.12.5 Re-entry of the building is strictly prohibited until the fire brigade officer or a senior person present declares it is safe to do so.

3.12.6 Employees are encouraged to report any concerns regarding fire procedures so OVH can investigate and take remedial action if necessary.

3.12.7 **The nominated Officer/ Fire Marshall present will:**

- Ensure the fire service has been summoned
- Initiate a roll call/rooms cleared for employees and visitors
- Liaise with the fire officer about the location of the fire, any missing persons, any dangerous substances present, service isolation points, e.g. gas, electricity etc.
- Not re-enter the building until told that it is safe to do by the fire service
- Ensure that discharged fire extinguishers are replaced
- Keep a record of the incident

3.13 **First Aid**

3.13.1 OVH is committed to providing sufficient provision for first aid to deal with accidents and injuries that arise at work.

3.13.2 To achieve this objective OVH will:

- Appoint and train a suitable number of first aid personnel to cover all work patterns
- Provide and maintain suitable and sufficient first aid facilities including first aid boxes
- Provide any additional first aid training that may be required to deal with specific first aid hazards

3.13.3 The minimum first aid provision at all sites is an adequately stocked first aid box and an Appointed Person to take charge of the first aid arrangements.

3.13.4	Appointed Person
3.13.1.1	<p>The Appointed Person duties include:</p> <ul style="list-style-type: none"> • Taking charge when someone falls ill or is injured, including calling an ambulance if required • Looking after and maintaining the first aid box and contents
3.13.1.2	<p>The Appointed Person will not be required to provide treatment for which they have not been trained.</p>
3.13.2	First Aiders
3.13.2.1	<p>First aiders are qualified personnel who have received training and passed an examination in accordance with HSE requirements.</p>
3.13.2.2	<p>The numbers of first aid personnel at each location will be determined by individual circumstances, the level of risk and in line with current government guidance.</p>
3.13.1.3	<p>First aid personnel will be provided with refresher training at regular intervals to keep their skills up to date.</p>
3.13.3	First Aid Boxes
3.13.3.1	<p>First aid boxes will be provided within the workplace to ensure there are adequate supplies for the nature of the hazards involved. All boxes will contain at least the minimum supplies suggested by L74: First Aid at Work. Approved Code of Practice. Only specified first aid supplies will be kept. No creams, lotions or drugs, however seemingly mild, will be kept.</p>
3.13.4	Portable First Aid Kits
3.13.4.1	<p>Portable first aid kits will be available for staff members required to work away from the normal workplace, where access to facilities may be restricted, such as:</p> <ul style="list-style-type: none"> • Work with potentially dangerous tools and machinery away from base location • Staff travelling abroad on business • Staff travelling in vehicles on a regular basis • Staff whose work takes them to isolated or remote locations • Staff participating in sporting or social events arranged or supported by OVH
3.14	<u>Gas</u>
3.14.1.1	<p>All reasonable steps will be taken to secure the health and safety of employees, tenants, and others who use or operate gas appliances. In this respect the term gas refers to mains gas, liquefied natural gas and liquefied petroleum gases, i.e. propane and butane.</p>
3.14.1.2	<p>In order to reduce the risks associated with the use of appliances and installations using gas, OVH will ensure:</p>

- That gas installations and appliances are designed and installed by qualified and competent persons in accordance with the Gas Safety (Installation and Use) Regulations
- That gas installations are maintained in a safe condition by carrying out annual safety checks and regular maintenance
- That portable and transportable gas appliances are inspected and tested frequently as required (the frequency will depend on the environment in which the appliance is used and the conditions of usage)
- Safe systems of work for maintenance, inspection or testing are promoted and implemented
- Monitoring of gas inspection, design and installation work, and the gas safety management system is carried out by competent persons
- That contractors and persons who carry out work on gas installations and appliances are competent to do so
- Suitable personal protective equipment is provided if required to include special tools, protective clothing and gas detection devices and such equipment is maintained in good condition
- Safety information is exchanged with contractors ensuring that they are fully aware of (and prepared to abide by) OVH's health and safety arrangements
- Detailed records required by the regulations and in relation to the above are maintained and retained
- LPG cylinders are transported safely to an approval waste disposal centre and not stored on OVH premises.
- Emergency procedures, systems and equipment are in place

3.15

Hazardous Substances (COSHH)

3.15.1.1

All reasonable steps will be taken to ensure all exposure of employees to substances hazardous to health is prevented or at least controlled to within statutory limits.

3.15.1.2

OVH will implement the following:

- Maintain an inventory of all substances hazardous to health kept on site and retain copies of relevant hazard data sheets
- Competent persons will be appointed to carry out risk assessments of the exposure to substances hazardous to health and advise on their control
- All operations which involve, or may involve, exposure to substances hazardous to health will be assessed and appropriate control measures will be taken if elimination or substitution of the substance is not possible
- Engineering controls will be properly maintained by planned preventive maintenance and annual performance monitoring to ensure continued effectiveness
- Systems of work will be reviewed at suitable intervals and revised if necessary
- all employees and others who may work in the affected areas will be informed of the purpose and safe operation of all engineering controls
- Personal protective equipment (PPE) will only be used as a last resort or as a back-up measure during testing or modification of other controls
- The type and use of PPE will be carefully assessed and maintained according to manufacturers' instructions
- Each assessment will be reviewed annually and all operations using hazardous substances will be reassessed every three years

- Qualified professionals, where necessary, will carry out health surveillance
- Employee health records of all exposures to substances hazardous to health will be kept for a minimum of 40 years
- All employees will be provided with understandable information and appropriate training on the nature of the hazardous substances they work with Employees will be informed about any monitoring and health surveillance results
- All changes to control measures and changes of PPE will be properly assessed and no new substances will be introduced into the workplace without prior assessment

3.15.2 **Information and Training**

3.15.2.1 OVH will give sufficient information and training to ensure full understanding of the hazards to health posed by substances in the workplace and the importance of the control measures provided. Information will also be given to others who may be affected such as contractors, temporary staff and visitors where appropriate.

3.15.2.2 Managers and supervisors of areas which use substances hazardous to health will be given additional training to ensure the proper management of the risks.

3.16 **Health Surveillance**

3.16.1.1 Health surveillance is the early detection of adverse health risks associated with a work activity. It allows staff at increased risk to be identified and additional precautions to be taken as necessary. It is also a means of checking the effectiveness of the existing control measures.

3.16.1.2 To ensure adequate health surveillance is implemented OVH will:

- Carry out risk assessments to identify those activities, processes or materials that are likely to give rise to a health risk
- Ensure that adequate control measures are put in place to reduce risks as far as possible
- Seek advice on risk reduction from our safety advisor, occupational hygienist or other relevant person as necessary
- Seek the advice of relevant people on the need for health surveillance where it is thought that a residual health risk remains following the implementation of control measures
- Advise employees of the health risks and the signs of ill health
- Ensure employees co-operate with health surveillance procedures provided
- Discuss with the relevant people any health concern brought to their attention by an employee

3.16.3 **Format of Health Surveillance**

3.16.3.1 If a reliable test can be carried out, the format of health surveillance may include the use of questionnaires to determine symptoms and may also involve clinical examination or measurements, such as lung function testing, hearing tests or biological sampling.

3.16.4	<p>Frequency of Health Surveillance</p>
3.16.4.1	<p>The level of risk will determine the frequency of health surveillance programmes. Where the risk is thought to be low, only baseline data will be required and staff should report to the team leader if any problems are experienced. Baseline data will usually be gathered at the employment interview.</p>
3.16.4.2	<p>If the risk is thought to be more significant, periodic health surveillance for all exposed staff will take place. In most cases this will be annual; however in some high-risk areas a more frequent programme may be agreed. More frequent surveillance may be required where a person's medical history suggests a particular vulnerability. The responsible person or occupational health nurse will make this decision and manage the recall process.</p>
3.16.4.3	<p>If health problems are identified following health surveillance, control measures will be reviewed and where necessary enhanced.</p>
3.16.4.4	<p>The occupational health nurse or doctor will advise on any specific actions to take with regard to the affected employee, e.g.:</p>
	<ul style="list-style-type: none"> • Reducing the length of exposure • Restricting work activities which cause exposure • Re-deploying the affected employee • Advising on additional personal protective equipment (PPE)
3.16.5	<p>Record Keeping</p>
3.16.5.1	<p>The responsible person or occupational health nurse will, with the support of team leaders, ensure employees requiring health surveillance are identified and recalled at appropriate intervals.</p>
3.16.5.2	<p>Health records will be kept for a minimum of 40 years.</p>
3.16.5.3	<p>Employees will be allowed reasonable access to their health records and a copy offered to individuals when they leave OVH.</p>
3.17	<p><u>Health and Welfare Facilities</u></p>
3.17.1.	<p>OVH will ensure all workers have access to suitable welfare facilities wherever they are engaged. The company is aware it has an obligation and the following requirements will be adhered to:</p>
	<ul style="list-style-type: none"> • The Principal Contractor is responsible for the supply and allocation of suitable and sufficient welfare facilities as may be required for any project. • All canteens and drying rooms allocated for site use will be adequate and suitable for the total and maximum number of people likely to use them at any one time. They will be provided to site in a clean and tidy condition. • Toilets and washing facilities will be equipped with an adequate supply of hot and cold or warm running water suitable for washing. There will also be an adequate supply of towels or operational hand dryers if required. • Drinking water will be available at each point of work. If this is not readily available through the host organisation or by means of a suitable connection to a safe water

supply then drums may be used, however they must be labelled and never used for any other purpose.

- When in use, all site facilities will be maintained in a clean and tidy condition; OVH will monitor this and report any failings to the Principal Contractor.
- A person will be appointed to ensure that: Canteen floors are swept and mopped. Table tops are washed after each use with hot clean soapy water. Cooking equipment is cleaned after each use. Canteen waste is properly disposed of on a daily basis.
- Site office, canteen and toilets areas are kept free from obstruction, waste materials and rubbish.
- If the welfare facilities are found to be in a poor condition the OVH will seek to instigate disciplinary proceedings against identified offenders. The Principal Contractor will remind the users that the facilities are there for the benefit of all users.

3.18 Lead

3.18.1.1 Lead can enter the body in many forms including dust, fumes or vapours. Exposure to lead can cause the following:

- Headaches
- Fatigue
- Severe constipation
- Abdominal pain
- Anaemia
- Weakness of extremities due to damage to the peripheral nerves (wrist drop)
- Possible brain damage at high concentrations
- Lead line of the gums

3.18.1.2 The company is aware that the level of exposure to lead is the deciding factor in the severity of the above problems.

3.18.1.3 Wherever lead is encountered in the workplace, the responsible person will assess the possible exposure level and take the necessary precautions and control measures to protect employees and others.

3.18.1.4 The responsible person will ensure that a competent person carries out a survey of lead levels. The level of lead in the air is normally averaged over an eight-hour time period. The current lead in air standards are:

- Lead 0.15mg/m³
- Tetraethyl Lead 0.10mg/m³

3.18.1.5 Exposure should be considered significant where persons at work are exposed to levels of airborne lead in excess of half the lead in air standard, there is a significant risk of ingesting lead and where there is a risk of skin contact with concentrated lead alkyls.

3.19 Legionnaires' Disease

3.19.1.1 All reasonable steps will be taken to identify potential legionellosis hazards and to prevent or minimise the risk of exposure.

<p>3.19.2</p> <p>3.19.2.1</p> <p>3.19.3</p> <p>3.19.3.1</p> <p>3.19.4</p> <p>3.19.4.1</p>	<p>At risk systems include the hot and cold water storage and distribution system and the wet cooling of air in the air conditioning system.</p> <p>To achieve control of legionella bacteria OVH will implement the following:</p> <ul style="list-style-type: none"> ● Avoidance of Conditions Favouring Growth of Organisms <ul style="list-style-type: none"> ○ As far as practicable, water systems will be operated at temperatures that do not favour the growth of legionella. The recommended temperature for hot water is 60°C and either above 50°C or below 20°C for distribution, as care must be taken to protect people from exposure to very hot water. ○ The use of materials that may provide nutrients for microbial growth will be avoided. Corrosion, scale deposition and build-up of bio films and sediments will be controlled and tanks will be lidded. ● Avoidance of Stagnation <ul style="list-style-type: none"> ○ Dead-legs, which occur when water services leading from the main circulation water system to taps or appliances are used only intermittently and other parts of systems which may provide a reservoir for infection will be identified and eliminated. ● Minimisation of Water Sprays from Cooling Towers <ul style="list-style-type: none"> ○ The dissemination of organisms will be reduced by careful design of equipment and the use of drift eliminators to stop excessive circulation of potentially contaminated air or enclosure. ● System Maintenance <ul style="list-style-type: none"> ○ Water systems will be disinfected by an effective means before being taken into service and after shut downs of five or more days. Plant will be regularly inspected and maintained (e.g. by monthly visits from a water treatment specialist). Plant will be disinfected periodically (normally twice yearly) by chlorination or by temporarily raising water temperatures. Biocides may be used to control microbial growth. Maintenance personnel must wear appropriate protective clothing. ● Sampling <ul style="list-style-type: none"> ○ Sampling for legionella will not normally be necessary, unless in the case of an outbreak or to monitor the effectiveness of precautionary measures. Weekly monitoring of chemical and microbiological water quality will be carried out to give a useful indication of the state of the system. ● Record keeping <ul style="list-style-type: none"> ○ Records will be kept of all maintenance, temperature monitoring and sampling carried out on the water system and the wet cooling tower system. <p>Selection, Training and Competence of Staff</p> <p>Persons carrying out control measures will receive appropriate training and supervision so they are able to perform their duties competently.</p> <p>Action in the Event of an Outbreak</p> <p>A contingency plan in case of an outbreak of legionellosis will be prepared. This will include the:</p> <ul style="list-style-type: none"> ● Identification of people who may have been exposed ● Involvement of public health authorities
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- Dissemination of information to employees and other interested parties as to the nature of the risks

3.20 **Lone Working and Personal Safety**

3.20.1 OVH will ensure, so far as is reasonably practicable, that employees and self-employed contractors who are required to work alone or unsupervised for significant periods of time are protected from risks to their health and safety.

3.20.2 **Definition:**

3.20.2.1 A Lone Worker is an employee who performs an activity that is carried out in isolation from other workers without close or direct supervision.

3.20.2.2 OVH will determine, by risk assessment, those activities where work can actually be done safely by one unaccompanied person. This will include the identification of hazards from, for example, means of access and/or egress, plant, machinery, goods, substances, environment and atmosphere, etc.

3.20.2.3 Particular consideration will be given to:

- The remoteness or isolation of workplaces
- Any problems of communication
- The possibility of interference, such as violence or criminal activity from other persons
- The nature of injury or damage to health and anticipated "worst case" scenario

3.20.3 **Personal Safety**

3.20.3.1 **Definitions:**

3.20.3.2 Personal safety is the freedom from worry that an individual might suffer physical harm and threats of physical harm.

3.20.3.3 OVH recognise that there is a close link between lone working and personal safety but we do not assume that it is only lone workers whose personal safety is at risk. Therefore, personal safety risks are assessed as part of the risk assessment process within all roles.

3.20.3.4 Specific personal safety training will be provided to all staff.

3.20.4 **Information and Training**

3.20.4.1 Employees and others will be given all necessary information, instruction, training and supervision to enable them to recognise the hazards and appreciate the risks involved with lone working and personal safety.

3.20.4.2 Employees will be required to follow the safe working procedures devised including:

- When working alone, in an isolated area of a building, for example, with all doors closed, ensure that someone is aware of your presence

- Check that work being done has been subject to risk assessment and check the assessment yourself – some work may have been identified as requiring the assistance of a second person
- Check warning markers (lists previous issues with tenants and other information that may highlight potentially violent tenants)
- If possible, and if it has been arranged beforehand, keep in regular contact with someone else, for example, by using a mobile phone to call into the office indicating your movements every couple of hours
- Do not put yourself at risk, if you do not feel safe discuss the situation with your immediate manager

3.21 **Machinery Maintenance**

3.21.1.1 OVH will take all reasonable steps to ensure the safety of all employees maintaining the machinery as well as the safety of those affected by the maintenance work. OVH will liaise with the suppliers of all new machinery to establish how that machinery should be maintained safely.

3.21.1.2 OVH will seek to inform and train personnel to implement this policy.

3.21.1.3 To achieve this objective OVH will, in consultation with relevant staff:

- Carry out an assessment of how the machinery should be isolated for specific maintenance work
- Carry out an assessment of how the machinery should be isolated to enable general maintenance work to be carried out safely
- Carry out an assessment of the maintenance of the machine itself including any heavy parts that have to be moved, any positions that have to be reached to achieve the necessary result and any risks of parts falling
- Carry out an assessment of how the maintenance of the machine affects its environment
- Carry out an assessment of all hazards that arise when guards have been removed
- Take appropriate measures for the protection of any person carrying out maintenance operations which the assessment has shown to involve risk to health or safety
- Provide any personal protective equipment that might be necessary to carry out the work safely
- Ensure that employees are aware of the reporting procedures, so that a responsible person is informed of any problems as soon as they arise and remedial action can be taken

3.21.2 **Information and Training**

3.21.2.1 OVH will give sufficient information, instruction and training as is necessary to ensure the health and safety of all staff and any others affected by maintenance of the machinery. Managers responsible for supervising the maintenance of the machinery will be appropriately trained.

3.21.3.2 OVH will ensure that only suitable and safe equipment and machinery is purchased or hired. This is done by considering the following points:

- Where and how will the machine be used;

- What will the equipment be used for;
- Who will use it (skilled employees, trainees);
- What risk to health and safety might result;
- Noise and vibration levels are to be considered;
- Potential for environmental damage;
- Where practical compare products from different hire companies to identify the least hazardous alternative.

3.22 **Manual Handling**

3.22.1 To prevent injuries and long term ill-health from manual handling OVH will ensure that operations which involve manual handling are eliminated, so far as is reasonably practicable. Where it is not practical OVH will carry out an assessment to determine what control measures are required to reduce the risk to an acceptable level.

3.22.2.1 To implement this policy the organisation will ensure that:

- Manual handling assessments are carried out where relevant and records are kept
- Employees are properly supervised
- Adequate information and training is provided to persons carrying out manual handling activities including details of the approximate weights of loads to be handled and objects with an uneven weight distribution
- Any injuries or incidents relating to manual handling are investigated, with remedial action taken
- Employees adhere to safe systems of work
- Safety arrangements for manual handling operations are monitored and reviewed
- Where relevant, employees undertaking manual handling activities are suitably screened for reasons of health and safety, before doing the work
- Special arrangements are made for individuals with health conditions which could be adversely affected by manual handling operations

3.22.2 **Reducing the risk of injury**

3.22.2.1 In considering the most appropriate controls, an ergonomic approach to designing the manual handling operation will optimise the health, safety and productivity associated with the task. Techniques of risk reduction will include:

- Mechanical assistance
- Redesigning the task
- Reducing risk factors arising from the load
- Improvements in the work environment
- Employee selection

3.22.2.2 No employee will be required to lift any item that they do not feel confident of doing without risking personal injury.

3.23 **Mobile Phones Use in Vehicles**

3.23.1 OVH is committed to reducing the risks which its staff face and create when driving at work. OVH asks its entire staff to play their part, whether they use a company vehicle, their own

or a hire vehicle. Staff driving for work must never make or receive calls on a mobile phone, whether hand-held or hands-free, whilst driving. Persistent failure to do so will be regarded as a serious matter.

3.23.2

Senior managers must:

- Lead by example, both in the way they drive themselves and by not tolerating poor driving practice among colleagues. They must never make or receive a call on a mobile phone while driving.

3.23.3

Line managers must ensure that:

- They also lead by personal example
- They do not expect staff to answer calls when they are driving
- Staff understand their responsibilities not to use a hand-held or hands-free mobile phone while driving
- Staff switch phones to voicemail, or switch them off, while driving, or ask a passenger to use the phone
- Staff plan journeys to include rest stops which also provide opportunities to check messages and return calls
- Work practices do not pressurise staff to use a mobile phone while driving
- Compliance with the mobile phone policy is included in team meetings and staff appraisals and periodic checks are conducted to ensure that the policy is being followed
- They follow OVH's monitoring, reporting and investigation procedures to help learn lessons which could help improve OVH's future road safety performance
- They challenge unsafe attitudes and behaviours and encourage staff to drive safely

3.23.4

Staff who drive for work must:

- Never use a hand-held or hands-free phone while driving
- Plan journeys so they include rest stops when messages can be checked and calls returned
- Ensure their phone is switched off and can take messages while they are driving, or allow a passenger to use the phone
- Co-operate with monitoring, reporting and investigation procedures

3.24

New and Expectant Mothers

3.24.1

OVH recognises that the general precautions taken to protect the health and safety of the workforce as a whole may not in all cases protect new and expectant mothers and there may be occasions when, due to their condition, different and/or additional measures will be necessary.

3.24.2

To implement effective measures for new and expectant mothers OVH will ensure that:

- Employees are instructed at induction to inform their relevant manager of their condition at the earliest possible opportunity and that the highest level of confidentiality is maintained at all times
- Risk assessments are carried out for all work activities undertaken by new and expectant mothers and associated records and documentation maintained

- Necessary control measures identified by the risk assessment are implemented, followed, monitored, reviewed and, if necessary, revised
- New and expectant mothers are informed of any risks to them and/or their child and the controls measures taken to protect them
- Any adverse incidents are immediately reported and investigated
- Appropriate training, etc. is provided where suitable alternative work is offered and accepted
- Provision is made to support new and expectant mothers who need to take time off work for medical reasons associated with their condition
- Where relevant a suitable rest area is provided to enable the new or expectant mother to rest in a degree of privacy and calm
- Where risks cannot be eliminated or reduced to an acceptable level then consideration will be given to adjusting working conditions and/or hours or if necessary providing suitable alternative work or suspension with pay

3.25 **Noise**

3.25.1.1 OVH will take all reasonable steps necessary to ensure that the risk of hearing damage to employees who work with noisy equipment or in a noisy environment is reduced to a minimum.

3.25.2 **Noise Assessments**

3.25.2.1 OVH will carry out regular noise exposure assessments of noisy areas, processes and/or equipment as appropriate.

3.25.2.2 Assessments will be used as the basis for formulating action plans for remedial measures when necessary. Assessments will be recorded and updated regularly, particularly when changes in work practice cause changes in noise exposure levels of employees.

3.25.3 **Reduction of Noise Exposure Levels**

3.25.3.1 OVH will, as far as is reasonably practicable, take all steps to reduce noise exposure levels of employees by means other than the use of personal protection. OVH accepts that the use of ear protectors is a last resort, and is committed to continuing to seek and introduce alternative methods for reducing noise exposure levels whenever possible in the future.

3.25.4 **Provision of Ear Protectors**

3.25.4.1 OVH will provide suitable and effective ear protection to employees working in high noise levels, as indicated as necessary by the results of noise exposure assessments. It will also provide for the maintenance and repair or renewal of the protective equipment, and provide training in the selection and fitting of protectors and details of the circumstances in which they should be used.

3.25.5 **Use and Maintenance of Noise Control Equipment and Procedures**

3.25.5.1 OVH will maintain all equipment and monitor all procedures introduced for the purpose of reducing noise exposure of employees, including enclosures, silencers and machine covers. All personnel will be required to

- Use these procedures and equipment correctly
- Promptly report any defects or deficiencies through the appropriate channels

3.25.6 **Provision of Training**

3.25.6.1 OVH will provide adequate training to employees as required.

3.25.6.2 All employees who are subject to high levels of noise will be provided with:

- Information, instruction and training about the harmful effects of noise
- Information and training on what they must do in order to protect themselves and meet the requirements of the law

3.25.6.3 Managers and supervisors responsible for formulating and carrying out the requirements of this policy in relation to noise, will also be given appropriate training.

3.25.6.4 Where a problem arises as a result of noise in the workplace, the employee must inform a responsible person immediately.

3.25.7 **Audiometric Testing**

3.25.7.1 Where employees are exposed to risk from high noise levels, OVH will adopt a programme of monitoring the hearing of employees to ensure noise controls are effective and that employees' hearing is not being adversely affected. This will involve regular audiometric tests carried out by properly trained personnel and pre-employment audiometric tests for new employees.

3.26 **Permits to Work**

3.26.1.1 Non-routine work, such as maintenance, cleaning, equipment installation and refurbishment, can produce health and safety risks over and above those normally encountered in our day to day activities. Permits to work are designed to check that all eventualities have been considered when planning and organising this type of work and are an important means of minimising any risks involved.

3.26.1.2 Employees, contractors and visitors are all expected to comply with the requirements of any permits that are in force.

3.26.1.3 Employees working off site, i.e. on another organisation's premises, are expected to abide by all permits to work operated on that site.

3.26.1.4 Should employees experience any problems with the operation of permit-to-work systems, they should immediately inform a responsible person (usually a manager or supervisor) so OVH can investigate and rectify the situation.

3.26.1.5 Permits to work exist to cover tasks carried out under certain circumstances and over limited time periods. They will therefore be displayed while the work specified is under way but will cease to operate when the tasks have been completed.

3.26.2	Information and Training
3.26.2.1	OVH will provide the necessary information and appropriate training to ensure that appropriate employees, supervisors, contractors and visitors are fully aware of the permits in use and are competent to undertake the tasks and tests prescribed in the permits.
3.27	<u>Personal Protective Equipment</u>
3.27.1	OVH provides personal protective equipment (PPE) when the risk presented by a work activity cannot be eliminated or adequately controlled by other means. When it is provided, it is because health and safety hazards have been identified that require the use of PPE and it is therefore necessary to use it in order to reduce risks to a minimum.
3.27.2	<p>To effectively implement its arrangements for the use of PPE OVH will:</p> <ul style="list-style-type: none"> ● Ensure that PPE requirements are identified when carrying out risk assessments ● Use the most effective means of controlling risks without the need for PPE whenever possible and only provide PPE where it is necessary ● Carry out an assessment to identify suitable PPE ● Ensure that if two (or more) items of PPE are used simultaneously, they are compatible and are as effective used together as they are separately ● Ensure PPE is available to all staff who need to use it ● Provide adequate accommodation for correct storage of PPE ● Provide adequate maintenance, cleaning and repair of PPE ● Inform staff of the risks their work involves and why PPE is required ● Instruct and train staff in the safe use and maintenance of PPE ● Make arrangements for replacing worn or defective PPE ● Review assessments and reassess the need for PPE and its suitability whenever there are significant changes or at least annually
3.27.3	Employees provided with PPE for their own personal use at work will be required to sign to confirm its receipt.
3.28	<u>Risk Assessment</u>
3.28.1	Risk assessment is a systematic examination of what within our business can cause harm to people and it helps us determine whether we are doing enough or further actions are required to reduce the likelihood of injury or ill health.
3.28.2	Our policy is to complete generic risk assessments of all our known and reasonably foreseeable health and safety hazards covering all our premises, equipment and activities in order to plan and prioritise the implementation of the identified control measures.
3.28.3	More detailed specific risk assessments will also be carried out as determined by the generic assessment to address those premises, equipment, people or activities to comply with specific legislation or to proactively manage health and safety risks.
3.28.4	<p>We will ensure that:</p> <ul style="list-style-type: none"> ● assessments are carried out and records are kept ● control measures introduced as a result of assessments are implemented and followed

	<ul style="list-style-type: none"> • employees are informed of the relevant results and provided with necessary training • any injuries or incidents lead to a review of relevant assessments • assessments are regularly monitored and reviewed • suitable information, instruction and training will be provided to all relevant persons
3.28.5	We may be controlling risks in various ways, determining the effectiveness of those controls is part of our risk assessment process.
3.29	<u>Safe Systems of Work / Method Statements / Safe Operating Procedures</u>
3.29.1	These are formal procedures/instructions which result from systematic examination of an activity in order to identify safe working practices to prevent those from carrying out the task or others who may be affected by the task being harmed. This must be read in conjunction with associated risk assessments for the activity.
3.29.2	These can be developed through various means with a formal route being identified in which those carrying out the task must follow. The information provided will give clear instruction on the steps required before, during and after the working activity.
3.29.3	These will be generic to cover a wide variety of working activities, ranging from general work to high risk machinery operations. More specific detailed documentation will also be provided if the generic is insufficient for the required task. All activities which create a foreseeable significant risk will have one of the above developed
3.29.4	These will be effectively communicated by a responsible manager to all relevant staff carrying out the activity.
3.29.5	Reviews are generally carried out annually, also when there's a change in the process, a change in equipment/machinery, a change of location which may have a significant impact on the working practice and following an accident/incident.
3.30	<u>Smoking</u>
3.30.1.1	Exposure to second-hand smoke, also known as passive smoking, increases the risk of lung cancer, heart disease and other illnesses. Ventilation or separating smokers and non-smokers within the same airspace does not stop potentially dangerous exposure.
3.30.1.2	It is the policy of OVH that all of its workplaces are smoke-free (including electronic vapours etc.) and that all employees have a right to work in a smoke-free environment.
3.30.1.3	Smoking (including the use and charging of electronic cigarettes) is prohibited throughout the entire workplace with no exceptions. This includes OVH vehicles.
3.30.2	Implementation
3.30.2.1	All staff are obliged to adhere to and to facilitate the implementation of the policy.
3.30.2.2	OVH will ensure that all employees and contractors are aware of the policy on smoking. They will also ensure that all new personnel are given a copy of the policy on recruitment or induction.

3.30.2.3	Appropriate 'no smoking' signs will be clearly displayed at or near the entrances to the premises. Signs will also be displayed in Company vehicles that are covered by the law.
3.30.3	Non-compliance
3.30.3.1	Non-compliance with this policy and relevant law will be treated as a disciplinary offence.
3.31	<u>Stress</u>
3.31.1	Stress at work can come about for a variety of reasons. It may be excessive workload, unreasonable expectations, or overly-demanding work colleagues. As a reasonable Company, we try to ensure that you are in a pleasant working environment and that you are as free from stress as possible.
3.31.2	Employees who experience unreasonable stress which they think may be caused by work should raise their concerns through OVH's grievance procedure.
3.31.3	Managers, when performing risk assessments on the activities of their department, will pay special attention to potential risks from stress and signs of stress at work will be noted.
3.31.4	If deemed appropriate OVH will offer an employee assistance scheme which will offer confidential and individual counselling to employees who may need it.
3.31.5	Any employee with clear stress-related problems shall receive (if requested) appropriate counselling and help from OVH employee assistance scheme but it is understood that this is not an alternative to looking at the cause of the stress and, if work-related, seeking to alter the structure and working arrangements of the job.
3.31.6	Following action to reduce the risks, they shall be reassessed. If the risks remain unsustainable by the employee concerned, efforts shall be made to reassign that person to other work for which the risks are assessed as tolerable.
3.32	<u>Temporary Employees</u>
3.32.1	OVH will take the necessary measures to ensure the health and safety of any temporary and casual staff in its employment.
3.32.2	<p>To achieve this, OVH will provide temporary employees with the following information prior to starting work:</p> <ul style="list-style-type: none"> ● Details of the qualifications and skills are required to do the work safely ● The health surveillance to be provided under statutory provisions ● Any risks to health and safety identified by workplace risk assessments ● The preventive measures to be taken ● Safe working procedures ● The action to be taken in the event of an emergency
3.32.3	The competence of temporary workers will be assessed to ensure they are capable of working safely.

3.33	<u>Training</u>
3.33.1	Training in health and safety is a legal requirement and also helps create competent employees at all levels within OVH to enable them make a far more effective contribution to health and safety, whether as individuals, teams or groups.
3.33.2	Competence of individuals through training helps individuals acquire the necessary skills, knowledge and attitude which will be promoted by managers and supervisors throughout the organisation.
3.33.3	Our training objectives will cover three areas, that of the organisation, the job and individuals.
3.33.4	<p>All employees will need to know about:</p> <ul style="list-style-type: none"> • The health and safety policy • The structure and system for delivering this policy
3.33.5	Employees will need to know which parts of the system are relevant to them, to understand the major risks in our activities and how they are controlled.
3.33.6	<p>Managers and supervisors training needs will include:</p> <ul style="list-style-type: none"> • Leadership and communication skills • Safety management techniques • Skills on training and instruction • Risk assessment • Health and safety legislation • Knowledge of our planning, measuring, review and audit arrangements
3.33.7	<p>All our employees training needs will include:</p> <ul style="list-style-type: none"> • Relevant health and safety hazards and risk • The health and safety arrangements relevant to them • Communication lines to enable problem solving
3.33.8	<p>All employees will receive induction training. Such training will cover:</p> <ul style="list-style-type: none"> • Fire procedures, warning systems, actions to be taken on receiving warning, locations of exits/escape routes, evacuation and assembly procedures, first aid/injury reporting procedures, names of first aiders/appointed persons, instruction on any prohibition areas (i.e. no smoking), issue of protective clothing/equipment and its use, instruction under COSHH, compulsory protection areas, thorough instruction applicable to their particular duties at work etc.
3.33.9	Training needs will be reviewed as a result of job changes, promotion, new activities or new technology, following an accident/incident and performance appraisal.
3.33.10	Records of training will be kept for all employees.

3.33.11

Employees must:

- Participate in the induction training activities they have been required to attend or carry out
- Work according to the contents of any training they receive
- Ask for clarification of any points they do not fully understand
- Not operate hazardous plant or equipment, use hazardous chemicals or carry out any hazardous activity unless they have been appropriately trained and instructed

3.34

Vehicles

3.34.1

OVH acknowledges that requiring staff to drive company cars or their own vehicle as part of their work activities exposes them to specific hazards and risks. To minimise this risk the organisation will:

- Identify any driver training or instruction that may be necessary with regard to accidents, servicing, regular vehicle condition checks, breakdown, maximum working and driving hours and personal safety
- Provide additional driver skills training or instruction, as appropriate
- Check all driver licenses on a periodic basis
- Ensure that all staff are fully trained, insured and in a fit state of health to drive company or their own vehicles for work-related activities
- Ensure that vehicles provided for staff are safe and in a roadworthy condition
- Ensure that company vehicles are serviced and maintained in good condition and at intervals recommended by the manufacturer
- Ensure that vehicles provided are suitable for the individual who has to use them, e.g. sufficient adjustments, head and leg room, position of controls etc.

3.35

Vibration

3.35.1

Regular exposure to continuous vibration from a work process has the potential to cause long term ill health including a range of occupational diseases collectively known as hand-arm vibration syndrome. To minimise the risk from vibration the organisation will:

- Assess the risks to health from exposure to continuous levels of vibration and determine the control measures needed
- Introduce effective control measures to ensure levels of exposure to hand-arm vibration and whole body vibration are eliminated or reduced as far as is reasonably practicable
- Record the assessments and review them periodically or when changes occur
- Ensure that the most appropriate equipment is used for the job
- Ensure that those persons responsible for managing work likely to result in exposure to hand arm vibration and whole body vibration are adequately trained and competent
- Inform, instruct and train employees about the risks and the precautions to be taken to protect themselves from the harmful effects of continuous exposure to vibration
- Ensure no new equipment or processes are introduced into the work activities where there is a foreseeable risk of hand-arm or whole body vibration without a risk assessment and approval of a designated manager
- Maintain an inventory of all vibration equipment used that is likely to cause hand-arm vibration and whole body vibration

- Monitor exposure of hand-arm vibration and whole body vibration and undertake appropriate health surveillance, where necessary
- Maintain tools to the manufacturer's specifications to avoid worsening vibration

3.36 **Violence**

3.36.1 OVH recognises that in certain situations violent behaviour towards staff may occur and therefore will take all reasonable measures to protect staff from violence and aggression.

3.36.2 We define violence and aggression as:

- Actual or threatened physical assaults on staff
- Psychological abuse of staff
- Verbal abuse which includes shouting, swearing and gestures
- Threats against employees

3.36.3 To achieve this objective we will:

- carry out risk assessments of potential conflict situations to determine the control measures necessary to protect staff
- ensure that premises are kept secure
- inform all employees of the procedure following a challenging behaviour incident
- not tolerate violence or challenging behaviour towards our employees
- train our employees who may be exposed to challenging behaviour situations
- support the employees involved in any incident
- support their decisions regarding the pressing of criminal charges
- provide any counselling or post-incident assistance required by the employees
- keep records of all incidents of violence and aggression and review the control measures with a view to continual improvement in employee safety

3.37 **Work Equipment**

3.37.1 OVH will provide a safe working environment in relation to work equipment safety and ensure all employees receive appropriate safety information and training in their work equipment. To achieve this objective OVH will:

- Provide work equipment that is suitable for the purpose and compliant with the requirements of the Provision and Use of Work Equipment Regulations
- Retain and make available the manufacturer's instruction manual for each item of equipment, where relevant
- Before using any item of work equipment ensure that a risk assessment is carried out and brought to the attention of relevant employees
- Inspect all equipment at installation and prior to first use
- Regularly inspect work equipment in accordance with the manufacturer's recommendations
- Maintain work equipment in accordance with the manufacturer's recommendations
- Keep records of all inspections and maintenance
- Provide adequate instruction, information and training to employees to enable the work equipment to be used and maintained safely

- Provide refresher training as appropriate and as determined necessary by workplace inspections

3.38

Work At Height

3.38.1.1

OVH will take all reasonable steps to provide a safe working environment for all employees who may be affected by work at height activities.

3.38.1.2

OVH will ensure that:

- All work activities that involve work at height are identified
- The need to undertake work at height will be eliminated whenever it is reasonably practicable to do so
- Adequate and secure working platforms with guard rails and toe boards will be used in preference to ladders which will be used for light, short duration work only and secured to prevent displacement
- When necessary, only scaffolds and scaffold towers that have been erected by a competent person will be used
- Roof lights and other fragile surfaces will be protected to prevent falls
- Fall arrest equipment will be used if other means of prevention (safety nets, harnesses with running lines, etc.) are not practical or justified
- Risks associated with those activities where work at height cannot be eliminated are evaluated and steps are taken to control them
- All the necessary equipment to allow safe access to and egress from the place of work is provided
- All the necessary equipment to ensure adequate lighting and protection from adverse weather conditions is provided
- Suitable plant is provided to enable the materials used or created in the course of the
- Work to be safely lifted to and from the workplace and stored there if necessary
- Any working platform and its supporting structures are selected and/or designed in accordance with current standards
- Regular inspections of all equipment required for working at height are undertaken
- Competent persons are appointed to be responsible for the supervision of all work at height and associated activities
- Any contractors from whom they procure services comply with this policy

3.38.2

Information and Training

3.38.2.1

OVH shall provide any information, instruction and training required to work in a safe manner when working at height.

3.39

Young People

3.39.1

While precautions taken to protect the health and safety of the workforce as a whole will, in many cases, also protect young persons, there are occasions when different and/or additional measures will be necessary due to their lack of experience, knowledge or absence of awareness of potential risks.

3.39.2

A 'young person' is defined as one who is below the age of 18 years.

3.39.3

To ensure the safety of young persons the organisation will:

	<ul style="list-style-type: none"> • carry out risk assessments to cover the activities of young persons • implement the actions determined by the risk assessment process • inform the young persons of any risks associated with their work and the control measures taken to protect them • provide a copy of the risk assessment to the parent/guardian of any young person below the school leaving age • provide additional appropriate information, instruction, supervision and training, etc. as determined by the risk assessment 	
4	Implementation	
4.1	The OVH Health and Safety Policy applies to all staff and there is a collective responsibility to prevent or minimise the risks to health and safety.	
5	Performance	
5.1	OVH expect all staff to ensure responsibilities in relation to health and safety are followed.	
6	Consultation	
6.1	OVH staff with specific responsibility in relation to health and safety have been consulted for technical input into the policy and all staff have been consulted in the policy development.	
6.2	Specific reference has also been made to relevant the Health and Safety Executive Approved Codes of Practice and Guidance.	
7	Review	
7.1	The policy will be reviewed every 12 months from the date of Executive Management Team (EMT) approval to ensure its continuing suitability, adequacy and effectiveness or as required by the introduction of new legislation or regulation that impacts on the Health and Safety obligations of OVH.	
8	Equality Impact Assessment	
8.1	Was a full Equality Impact Assessment (EIA) required?	Yes
8.2	When was EIA conducted and by who?	OVH Compliance Manager and OVH Policy and Strategy Officer
8.3	Results of EIA	The EIA recommendations that any potential differential impact identified is mitigated as far as is reasonably possible through the risk assessment, checking and training regime that support the operation of this policy. OVH will, however, ensure

		the risk assessment element is kept up to date and will make any required amendments to the policy and supporting procedures as a result of incidents or risks assessment audit findings.	
9	Scheme of Delegation		
9.1	Responsible committee for approving and monitoring implementation of the policy and any amendments to it	OVH EMT	
9.2	Responsible officer for formulating policy and reporting to committee on its effective implementation	Director of Operations- Asset and Compliance	
9.3	Responsible officer for formulating, reviewing and monitoring implementation of procedures	Director of Operations-Asset and Compliance	
10	Amendment Log		
Date of revision:	Reason for revision:	Consultation record:	Record of amendments:
4 th June 2019	In line with the Review Schedule	See section 6 above	The sections have been re-arranged in alphabetical order and renumbered.
14 th July 2020	In line with the Review Schedule	See section 6 above	<ul style="list-style-type: none"> • Change at 3.25.2- Removed the section regarding 'hearing zone'. • Change @ 3.3.4.5- Added that a report must be submitted within 15 days of the incident/ accident using an appropriate form