

# Health and Safety Policy and Handbook

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**Incorporating:**

**The Policy Statement**

**The Health and Safety Management System**

**The Fire Safety Awareness Procedures**

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*Some information (e.g. floor plans) has been redacted from the published version of this Handbook on the basis that disclosure of the information would, or would be likely to, endanger health and safety (section 39(1) of the Freedom of Information (Scotland) Act 2002).*



Scottish Information  
Commissioner

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## Glossary and abbreviations

Term used	Explanation
The SIC	The Scottish Information Commissioner
The Commissioner	The Scottish Information Commissioner, staff of SIC (depends on context)
SMT	Senior Management Team
FAM	Finance and Administration Manager
HOCS	Head of Corporate Services
HOPI	Head of Policy and information
HOE	Head of Enforcement
CST	Corporate Services Team

# Health and Safety Policy Statement

## This policy will ensure we:

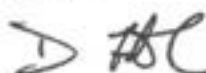
- provide adequate control of the health and safety risks arising from our work activities
- consult with our staff on matters affecting their health and safety
- provide and maintain safe equipment
- have safe handling and use of substances
- provide information, instruction and supervision for staff
- provide all staff with adequate training and make sure they are competent to carry out their tasks
- prevent accidents and cases of work-related ill health
- maintain a safe place of work and healthy working conditions
- review and revise this policy as necessary at regular intervals.

**Overall and final responsibility for health and safety lies with the Commissioner.**

## All staff should ensure they:

- co-operate with managers on health and safety matters
- not interfere with anything provided to safeguard their health and safety
- take reasonable care of their own health and safety and that of others who may be affected by their actions at work
- raise any specific queries or concerns relating to health and safety in the workplace with a member of the SMT or a FAM.

Signed:



Daren Fitzhenry, Scottish Information Commissioner

Date: 13/07/21

# Health and Safety Management System

## Introduction

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1. It is the SIC's duty to ensure, as far as is reasonably practicable, the health, safety and welfare at work of our staff and, also, other persons whilst they are on our premises or affected by our activities.
2. Health and safety are key concerns for the organisation and should be managed robustly and effectively.
3. This Handbook details our health and safety management system.
4. A systematic approach to health and safety ensures we comply with all legislative obligations.
5. It also ensures that everyone in our organisation knows what is expected of them and the correct way of carrying out their respective duties.
6. In addition, it provides a foundation for continual improvement of health and safety management within our organisation.
7. The health and safety management system has the full support of the SMT but is dependent on the support of all staff to ensure its success and effectiveness.
8. We manage health and safety through a management system and do all that is reasonably practicable to promote wellbeing and prevent personal injury/ill health and damage to property.
9. The aim of the management system is to:
  - provide the SIC and others with assurance that health and safety is managed in accordance with relevant legislation and regulations
  - give confidence to those who scrutinise the robustness and effectiveness of health and safety arrangements in the organisation
  - enable the SIC to take informed decisions with regard to health and safety issues.
10. We provide and maintain a safe place of work and healthy working conditions, equipment and systems of work for all staff and third parties including contractors, the general public and other third parties when they come into contact with us or any of our services.
11. The Commissioner ensures that health and safety is an integral part of the overall management culture and seeks to develop a positive attitude to health and safety amongst staff by:
  - visibly demonstrating a clear commitment to improve health and safety performance
  - promoting co-operation by recognising that all staff have an important contribution to make to effective health and safety management
  - providing opportunities for participation and involvement in health and safety activities, e.g. risk assessments
  - ensuring the communication of necessary information throughout the organisation

- securing the competence of staff from the start of their employment with the organisation through training and coaching
- implementing systems, which will identify health and safety training needs arising from recruitment or changes in staff, procedures, or systems of work.

12. For business continuity purposes, it may be necessary to provide temporary and interim policies and procedures to add to or amend the provisions set out in this handbook, for example, when dealing with the impact of a pandemic. Staff will be advised where such temporary and/or interim policies and/or procedures are required and the reasons for them.

## Roles and responsibilities

Title	Responsibility	Action
Commissioner	<ul style="list-style-type: none"> <li>• Overall responsibility for health and safety.</li> <li>• Ownership of the health and safety policy and its effective implementation through delegation to SMT, Line Managers and others.</li> <li>• The health, safety, welfare and work of staff.</li> <li>• Assurance that the policy is applied and health and safety is managed effectively.</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure the establishment and maintenance of health and safety management systems within all areas including the assessment of risks, and the effective planning, organisation, control, monitoring and review of the preventative and protective measures necessary to control the risks.</li> <li>• Approve the health and safety policy and management system - arrangements, responsibilities and safety procedures (with SMT).</li> <li>• Monitor the effectiveness of the health and safety management system and of the procedures in place on an annual basis, or at any time there are any significant changes to the working environment (with SMT).</li> <li>• Promote the health and safety message so it is an integral part of the overall management culture and develop a positive attitude to health and safety amongst staff by visibly demonstrating commitment to achieving a high standard of health and safety performance.</li> <li>• Ensure adequate resources are made available to enable the health and safety management system to be implemented, including appropriate training.</li> <li>• Appoint a competent person to assist in applying the provisions of health and safety legislation.</li> <li>• Ensure that those with delegated health and safety responsibilities carry them out effectively and in compliance with the organisation's health and safety policy.</li> <li>• Cooperate with staff to provide and maintain a safe place of work and healthy working environment, so far as is reasonably practicable.</li> </ul>
SMT	<ul style="list-style-type: none"> <li>• Shared ownership of the health and safety policy</li> <li>• Shared ownership of the management of health and safety</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure a health and safety management system is in place.</li> <li>• Monitor the implementation and effectiveness of the health and safety policy and management system, reviewing it periodically to ensure it remains valid and fit for purpose in relation to all operational activities thus confirming compliance with statutory duties.</li> <li>• Ensure staff are aware of risk, that it is embedded in processes and performance management and that staff are appropriately trained to deal with risk.</li> </ul>

Title	Responsibility	Action
HOCS	<ul style="list-style-type: none"> <li>• Has delegated responsibility from the SIC to oversee the health and safety function</li> <li>• Provides assurance to SIC / SMT</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure that corrective actions identified by our external Health &amp; Safety adviser during health and safety audits are implemented.</li> <li>• Arrange for risk assessments to be carried out on work activities which are not adequately described by the generic risk assessments.</li> <li>• Ensure, so far as is reasonably practicable, that all work activities are carried out in accordance with the relevant safe system of work, and in accordance with the preventive and protective measures identified by the relevant risk assessment.</li> <li>• Ensure that staff are aware of safe systems of work and preventive/protective measures.</li> <li>• Ensure all staff are informed and made aware of their responsibilities and duties under the health and safety policy.</li> <li>• Ensure adequate health and safety records are kept within the office.</li> <li>• Ensure that new staff receive induction training in accordance with the office induction pack.</li> <li>• Ensure, so far as is reasonably practicable, the welfare of staff with particular reference to staff with special requirements e.g. disabled staff, new and expectant mothers.</li> <li>• Present a health and safety report to the Senior Management Team every 6 months.</li> <li>• Ensure that disciplinary action is considered by the relevant Line Manager where any member of staff persistently breaches the organisation's health and safety policy and management system</li> <li>• Ensure all accidents are correctly investigated and recorded within the accident book, and that information is passed on to the SMT.</li> </ul>
FAM	<ul style="list-style-type: none"> <li>• Holds delegated responsibility from the HOCS for the implementation of health and safety procedures, day to day management of and reporting on health and safety issues.</li> </ul>	<ul style="list-style-type: none"> <li>• Assist the HOCS in the development of plans for the implementation of the health and safety management system.</li> <li>• Maintain and review the health and safety policy and management system.</li> <li>• Prepare risk assessments on work activities not adequately covered by the generic risk assessments and review all risk assessments on an annual basis; prepare new risk assessments as required.</li> <li>• Bring any health and safety concerns to the attention of the HOCS. This should include requests from staff where health and safety needs to be taken into consideration e.g. positioning of desks, new initiatives, health issues</li> <li>• Assist in any accident/near-miss remedial actions and notify the HOCS of all incidents and injuries entered into the accident book.</li> <li>• Ensure monthly office and buildings inspections are carried out.</li> <li>• Notify the HOCS of any safety concerns identified through monthly internal inspections or through the preparation of</li> </ul>



Title	Responsibility	Action
<b>All staff</b>	<ul style="list-style-type: none"> <li>Staff duties under section 7 of the Health &amp; Safety at Work etc. Act 1974 include cooperation to enable the SIC to comply with statutory duties for health and safety.</li> </ul>	<p>risk assessments.</p> <ul style="list-style-type: none"> <li>Take reasonable care of your own health and safety and that of others who may be affected by your actions or omissions whilst working.</li> <li>Co-operate with the SIC and your co-workers to help everyone meet their legal requirements.</li> <li>Maintain an awareness of all relevant risk assessments.</li> <li>Work safely, and inform a FAM or the HOCS of any situation or condition whilst working, which you consider unsafe, unhealthy or which could become unsafe or unhealthy.</li> <li>Avoid activities which could create a hazardous or unsafe condition, which could compromise the health and safety of yourself, other members of staff, other persons whilst they are on our premises or who might be affected by our activities or equipment supplied by the organisation.</li> <li>Ensure familiarisation with fire evacuation procedures and with the position of fire equipment, alarms, evacuation routes and assembly points.</li> <li>Ensure any third-party workers who are engaged in activities in the SIC's workplace are made aware of and work within the health and safety policy and management system.</li> <li>Report any accident, incident or dangerous occurrence including near misses, regardless of severity, to a FAM immediately so that it can be investigated and all reasonable and practicable measures can be taken to remove or minimise the cause(s).</li> <li>Except where sanctioned by the SIC, not to consume any alcohol in the workplace nor enter the workplace in an intoxicated condition nor consume alcohol whilst carrying out your work or when in charge of a vehicle when carrying out your work.</li> <li>Not ingest, inject or take in any manner whatsoever any form of drugs which could in any way affect your ability to function and/or work in a safe manner. If drugs have been prescribed by a medical professional you must inform your Line Manager immediately if such medication could have an adverse effect on your ability to work in a safe manner.</li> </ul>
<b>Worknest</b>	<ul style="list-style-type: none"> <li>The SIC maintains a contract with an external Health and Safety consultancy firm, Worknest, which provides professional and technical support to the organisation.</li> </ul>	<ul style="list-style-type: none"> <li>This service complements the available internal resources, thus assisting the organisation to discharge its duty as set out in the Management of Health and Safety at Work Regulations 1999, as amended, to appoint an adequate number of competent persons to achieve and maintain legal compliance.</li> <li>The service includes the provision of: <ul style="list-style-type: none"> <li>External auditing of the health and safety system</li> <li>A 24-hour helpline for all health and safety-related queries</li> <li>Specialist consultancy and training support as required.</li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>The SIC also ensures the provision of an external Occupational health service in case of the need for specialist</li> </ul>	<ul style="list-style-type: none"> <li>To provide independent, expert reports and assessments as required by the SIC</li> </ul>

Title	Responsibility	Action
	advice.	

## Governance arrangements

### Information, instruction and training

13. The HOCS is responsible for ensuring that staff are fully aware of, and competent to undertake, all delegated health and safety duties.
14. Training needs are met through induction training for new recruits, general health and safety training for all staff and any other specific health and safety training as deemed necessary. Routine training includes:

Topic	To whom	Frequency
Circulation of Risk Assessments - Manual Handling, General, Fire, Driving for Work Purposes, Lone Working, Violence in the Workplace, Organisational Resilience, Working at Height	All staff	Annual
Circulation of Control of Substances Hazardous to Health ("COSHH") Risk Assessments	Administrators, cleaners and relevant staff	Annual
Manual Handling Training provided by DVD	All staff	Annual
Fire Awareness Training (RoSPA fire safety DVD)	All staff	Annual

15. A record of training is kept and any signed training documents are scanned and saved into VC.

### Communication and consultation

16. Staff are kept informed about health and safety issues and updates by:
  - written instructions
  - information by email
  - all staff meetings
  - the staff notice board located in the corridor leading to the kitchen
17. The Health and Safety Handbook is circulated to all staff who sign to confirm it has been read and they have understood the duties placed upon them. Any significant updates between policy reviews are also circulated.
18. The signed documentation is held on record in the Health and Safety folder in Bell and in VC.

19. Information in documents produced as required by the health and safety management system are brought to the attention of staff to whom the contents are relevant.

### **Monitoring, audit and review of safety performance**

20. The effectiveness of the health and safety policy and management system is monitored.
21. Accidents at the following levels of severity will be analysed by the HOCS with a view to determining and eliminating their causes and deciding whether the accident is reportable under RIDDOR - Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013):
- Fatality/ specified injury/dangerous occurrence/work related illnesses
  - Lost time accidents (7 consecutive days or more)
22. Dangerous occurrences' (incidents with the potential to cause harm). Our external Health & Safety adviser carries out regular and systematic inspections and audits to ensure that the requirements of the SIC's health and safety policy and management system are being met.
23. Staff are reminded that they have a duty to report immediately any defect or safety concern of which they become aware.
24. We review safety performance on a regular basis and draw upon all available information to establish plans for ongoing legislative compliance and improved health and safety risk.

### **Review**

25. This Handbook is reviewed annually.
26. Any revision to this Handbook is drawn to the attention of all staff.
27. Any documentation produced under this Handbook is reviewed when necessary.

## **General arrangements**

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### **Hazard identification, risk assessments and determining controls**

28. We maintain procedures for the ongoing identification of hazards and risks and to implement the necessary control measures. The completion of risk assessments is a statutory requirement and is undertaken by a FAM or other competent persons.
29. Risk assessments are conducted as follows:
- record the significant findings
  - involve staff in the process (so far as reasonably practicable)
  - inform staff of the risks identified and the precautions which they should take to ensure that the risks remain adequately controlled
  - assess any additional risks which may arise in relation to young persons, disabled persons and pregnancy
  - confirm that the risks are adequately controlled or identify and implement control improvements with appropriate priority
  - review assessments wherever they are no longer valid.

30. Appropriate documentation is produced by a FAM or other competent persons to record the findings of risk assessments. Where necessary, safe working procedures are developed to supplement risk assessments. Records of the completed risk assessments are retained in line with the Retention Schedule and reviewed periodically to ensure appropriate controls remain in place.

### **Building resilience to stress**

31. We recognise that whilst a degree of pressure can be a positive force, excessive pressure can have a negative effect on both health and performance at work. We are committed to building resilience by promoting good health and by providing suitable support mechanisms for staff suffering from the negative effects of stress.
32. We will identify stressful jobs and situations through the risk assessment process and other appropriate means, with the objective of reducing harm from workplace stress as far as is reasonably practicable.
33. We use a number of approaches to monitor, build and maintain resilience to stress through:
- monitoring of timesheets and the use of flexi time
  - monitoring of sickness absence
  - monitoring of workloads
  - regular 1:1's
  - the Performance & Development Framework
  - training of management and staff
  - provision of an employee assistance programme
34. We will aim to provide suitable information to staff and managers in relation to building resilience to managing stress in the workplace and, where appropriate, the information will include guidance on:
- recognising the symptoms of stress
  - the effects of stress at work
  - effective communication
  - handling difficult situations
  - time management
  - good employee relations
35. Where members of staff are diagnosed as suffering from workplace stress, as far as reasonably practicable, we will provide the appropriate mechanisms to promote a return to full health as quickly as possible.
36. Members of staff are encouraged to refer themselves to their Line Manager or the HOCS, or to make use of the Employee Assistance Programme. All referrals will be dealt with in confidence.

### **Violence**

37. We have in place a process to identify and assess the risks from violence in the workplace.
38. Where significant risks are identified, appropriate control measures are implemented to reduce the risks to the lowest level reasonably practicable.
39. All staff are required to report any incidents of violent behaviour (verbal or physical) to which they have been subjected to their Line Manager or the HOCS who will discuss and investigate the incident and take appropriate action to prevent a recurrence.
40. Any action taken or proposed action will be recorded.

### **Fire safety**

41. We shall, so far as is reasonably practicable, ensure the safety of staff in respect of harm caused by fire in the workplace and must make and give effect to such arrangements as are appropriate, having regard to the size of the organisation and the nature of its activities, for the effective planning, organisation, control, monitoring and review of the fire safety measures.
42. We believe that the correct approach to fire safety is one of fire prevention i.e. to prevent fires breaking out. However, it would be dangerous to assume that fires can never happen. Therefore, we ensure that:
  - fire can be detected in a reasonable time and people warned
  - people in the building can get out quickly and safely
  - staff in the building are aware of what to do if there is a fire
  - the building has suitable and sufficient emergency procedures
  - there are adequate supplies of firefighting equipment available
43. Minimising damage to property is important but not if it jeopardises the safety of staff or third parties. The safety of life must override all other considerations at all times.
44. We will ensure that a fire risk assessment is carried out in accordance with the Fire (Scotland) Act 2005 and reviewed annually.
45. See below for the SIC's Fire Safety Awareness Procedures.

### **Welfare provisions**

46. Provisions are in place to ensure the following are satisfactory and meet the necessary requirements:
  - ventilation, temperature and lighting
  - cleanliness and waste materials
  - room dimensions and space, including workstations
  - conditions of floors, traffic routes, doors and gates
  - avoidance of falls or falling objects
  - sanitary and washing facilities
  - drinking water.

## Lone working

47. In itself, working alone is not contrary to health and safety laws and it will often be safe to do so. However, we must consider carefully, and then deal with, any health and safety risks for staff when working alone in carrying out work activities and, also, for contractors working alone in our premises.
48. Each member of staff has a responsibility to take reasonable care of themselves and other persons affected by their work activities and to co-operate with their employer in meeting their obligations.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

50. We have a duty to assess risks to lone workers carrying out work activities and to take steps to avoid or control risks where necessary and this assessment must cover the following:
- involving staff when considering potential risks and measures to control them
  - ensuring risks are removed where possible, or putting in place control measures
  - relevant instruction, training and supervision requirements
  - reviewing risk assessments periodically or when there has been a significant change in working practice.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Cleanliness**

- 55. All staff, contractors and visitors are expected to work in a safe and tidy manner.
- 56. Toilets, washing facilities and drinking areas are provided for staff comfort and convenience and should be kept clean and sanitary.
- 57. Housekeeping in all areas is of a high standard to minimise the risk of slips, trips or falls.
- 58. Debris, food scraps, etc. should not be allowed to accumulate, and spillage of any liquids should be cleaned up immediately.
- 59. All waste must be disposed of safely and as soon as practicably possible.
- 60. Materials and equipment should be stored safely and regular inspections carried out to ensure continued tidiness.

**Waste disposal**

- 61. There is no hazardous waste within the organisation. Should this change, the risk will be reviewed and a COSHH risk assessment carried out.
- 62. Non-hazardous waste should be disposed of into an appropriate container as soon as practicable.
- 63. Sharp debris should be dealt with appropriately and handling of it kept to a minimum.

**Safe stacking and storage**

- 64. All materials, equipment and debris on the SIC's premises should be stored in a manner that does not create or cause a hazard.
- 65. Doorways, walkways and fire exits should be kept clear at all times.
- 66. Materials, when not being used, should be stored safely.

**Young persons**

- 67. Under the Management of Health and Safety at Work Regulations 1999, an assessment of the risks to young people (i.e. under the age of 18) must be carried out before they start work/work experience.
- 68. We will put in place control measures which will either remove those risks entirely or reduce them to the lowest possible level as far as reasonably practicable.

69. A young person will not be allowed to work where significant risk remains in spite of our best efforts to take all reasonable steps to control it.
70. Young people must be informed appropriately of the risks and the controls in place for their safety.
71. The parents/guardians of any students (and staff) below minimum school leaving age will also be informed of the key findings of the risk assessment and the control measures.

### **New and expectant mothers**

72. When you tell us you are pregnant we will carry out periodic risk assessments, at least each trimester, to identify any risks to which you and/or your baby may be exposed whilst at work.
73. Where any such risks are identified, we will take all practicable steps to mitigate them, taking advice from our external Health & Safety advisers if necessary. This may result in temporary adjustments to your working conditions and/or finding you suitable alternative work and, if neither is feasible, we may consider suspending you from work on maternity grounds on your existing terms and conditions of employment, including your existing rate of pay.
74. Many expectant mothers do not wish to disclose their pregnancy until 12 weeks of the pregnancy has passed. However, we would strongly encourage any expectant mother to inform a member of the SMT at the earliest possible time to ensure that relevant working activities can be assessed and adjusted where appropriate.

### **Office activities, including use of Display Screen Equipment**

75. Use of display screen equipment by staff is subject to assessment under the Health and Safety (Display Screen Equipment) Regulations 1992. Assessments are carried out at staff induction, followed by every two years for all staff or as required if there is a change in working arrangements or circumstances.
76. The use of such equipment may present a risk of injury or ill health as a result of repetitive movements and we are committed to reducing these risks through suitable control measures. If this involves referral to an external body then the HOCS should approve external assessments.
77. You must inform a FAM if you are suffering aches, pains, headaches or any other symptoms which may be attributable to your use of display screen equipment at work.

### **Eye tests and any necessary spectacles**

78. Medical evidence shows that using display screen equipment is not associated with damage to eyes or eyesight, nor does it make existing defects worse.
79. Eyesight tests are free. If you undergo a test with a qualified optometrist which shows you need a set of spectacles specifically for DSE work, we will meet the cost of a basic frame and lenses, provided you obtain written confirmation from the optometrist. You should arrange for the optometrist to complete the appropriate sections of the Health and Safety Eye Examination Claim Form found in VC.
80. The above form also serves as your claim form for the cost of the spectacles. Please ensure you obtain a receipt and attach it to the form.

### **First aid and medical attention**



81. We ensure there are sufficient numbers of first aid personnel and equipment to deal with accidents and injuries.
82. The role of the Appointed First Aider is undertaken by first aid personnel and, in their absence, by a FAM or the HOCS.
83. A FAM has responsibility for checking the contents of the first aid box on a monthly basis. This task is delegated to the Administrator.
84. The Health and Safety (First-Aid) Regulations 1981 only place a legal responsibility on employers to provide first aid for their staff. We will, however, also ensure the organisation is equipped to meet the basic first aid requirements of persons other than staff including visitors to the office and contractors.
85. First aid supplies are held in Bell.

### **Accident and incident reporting and investigation**

86. All accidents and near misses, no matter how minor, must be reported to a FAM or a member of the SMT. A near miss is an event which could have resulted in injury or damage.
87. All accidents, dangerous occurrences or near misses will be investigated with the objective of identifying the cause and addressing any issues arising.
88. All accidents and/or incidents to staff, and others affected by the SIC's activities, must be recorded in the accident book which is kept in Bell. We will ensure compliance with the requirements of RIDDOR. Fatalities, specified injuries, notifiable diseases and dangerous occurrences must be reported to the HSE Incident Contact Centre by a FAM or the HOCS as soon as possible - [Ways to contact HSE](#)

### **Manual handling and lifting**

89. Manual handling operations undertaken by staff are subject to risk assessment under the Manual Handling Operations Regulations 1992 (as amended).
90. Manual handling risk assessments are reviewed regularly to make sure that they continue to be fit for purpose and circulated for all staff to review.
91. A manual handling training DVD is shown to all staff on an annual basis.
92. If you are suffering from an acute injury or long term ill health condition likely to be aggravated by manual handling or lifting, you must inform a FAM or the HOCS.

### **Working at height**

93. The SIC's activities do not normally involve any work at height. However, if this should change, we will comply with all requirements of the Work at Height Regulations 2005. The risk assessment process will identify how the potential work at height risks arise, the impact on those affected and how those risks should be managed.
94. All staff who may undertake a task involving working at height will be made aware of the risk assessment. Each member of staff is responsible for understanding the assessment and for compliance with the protective measures.

### **Vehicles and occupational road risk**

95. All staff have a regular place of employment, which is a single fixed location i.e. the office at Kinburn Castle.
96. We carry out a 'Driving for work purposes' risk assessment covering vehicle-related activities within the organisation and the actions from these assessments are implemented effectively.
97. Any journey to the premises of a third party on behalf of the SIC will be considered a work journey. This will include travel to/from bus or train stations when public transport is to be used for part of the journey.
98. We have the following procedures in place to verify driver competence and vehicle roadworthiness if you use your own car for travelling on behalf of the SIC:
- Enter your details on the gov.uk website (<https://www.gov.uk/view-driving-licence>) to share with a FAM, in confidence, details of the types of vehicle you are licensed to drive. You do not need to share information relating to endorsements.
  - Provide your vehicle details (registration number and make) to a FAM so a check can be made via the gov.uk website (<https://www.gov.uk/get-vehicle-information-from-dvla>) to establish whether a current MOT certificate exists (where required).
  - Show a FAM a current certificate of insurance for your vehicle which confirms cover is in place for business use.
99. If you only use your vehicle for commuting to and from work you should confirm this. You will then be exempt from the checks listed above.
100. There is a form in VC which you must complete accordingly, and which will be signed by both you and a FAM to confirm the process has been completed - Driving for work purposes: Procedures for checks

### **Hazardous substances**

101. Staff activities do not normally involve the use of any hazardous substances. However, should this change, a suitable and sufficient COSHH assessment shall be carried out and appropriate control measures implemented.
102. We will ensure that no work is carried out which is liable to expose any staff or others to any product, chemical or substance hazardous to health unless a suitable and sufficient assessment of the risks created by that activity and of the steps needed to reduce the risks has been made.

### **Asbestos**

103. An asbestos materials survey was carried out on the premises in March 2016.
104. Asbestos Containing Materials (ACMs) are "presumed" in the four live electrics boxes situated in the cupboard in the gents' toilet on the ground floor. There is a label on each box to warn of the possible presence of asbestos.
105. An asbestos register is also held in VC.
106. It is SIC policy that if a contractor needs to carry out work on any of these boxes, staff commissioning the work should ask the contractor if the work is licensable or not and establish if they have such a licence and have received the required training for work on or

around ACMs (evidence of this will be requested). The contractor should also provide a method statement detailing how the work will be carried out.

107. More information on asbestos licensing can be found on the HSE website at <http://webcommunities.hse.gov.uk/connect.ti/asbestos.licensing/view?objectId=8516&exp=e1>
108. If we suspect asbestos containing material has been discovered, emergency asbestos procedures are in VC and the H&S folder in Bell.

### **Legionella**

109. A legionella risk assessment was carried out on 1 June 2017, and a full report provided.
110. A Written Control Scheme has been put in place.

#### *Written Control Scheme:*

- a schematic diagram can be found in VC 90360
  - weekly, monthly, quarterly and annual control measures on the water system are carried out by the CST and the cleaners
  - details of the control measures are kept in VC
  - a plumber will be contacted promptly if the control measures fail.
111. Staff carrying out control measures should read the HSE guidance on Legionella – no other training is required as the control measures are straightforward.
112. A regular risk assessment is carried out to monitor for changes to the water system.

### **Personal protective equipment (PPE)**

113. It is highly unlikely that you will require PPE in the normal course of your work.
114. Where a need is identified, appropriate PPE and training in its use will be provided.

### **Work equipment**

115. The SIC's activities do not normally involve the use of work equipment. However, in any circumstances where work equipment is to be purchased/used (except office equipment) we will comply with all aspects of the Provision and Use of Work Equipment Regulations 1998. The legislation covers work equipment whether SIC-owned or whether hired or leased.

### **Electricity**

116. We are committed to managing the risks relating to electricity to a high standard and ensuring full compliance with the relevant UK electrical safety legislation.
117. As far as is reasonably practicable, we ensure that:
- all fixed electrical installations are installed and maintained in a safe condition and checked once every five years
  - all portable electrical appliances are supplied and maintained in a safe condition and tested annually by a qualified electrician
  - all persons responsible for checking, inspecting and testing electrical equipment and installations are competent

- all persons who use electrical appliances can do so safely without risk of harm from electricity
- there are sufficient resources available to control all risks from electricity.

## Gas

118. The Gas Safety (Installation and Use) Regulations 1998 require all engineers involved in the installation, inspection, servicing, maintenance and repair of gas appliances to be on the Gas Safe Register. The requirements apply to both natural and liquefied petroleum gas (LPG).
119. No person may work on gas fittings or appliances unless they are competent to do so.
120. The boiler is inspected and certified at least every 12 months by an appropriately qualified Gas Safe Registered engineer.
121. A gas soundness test on the supply pipe is carried out every year.

## Contractors and sub-contractors

122. The term "contractor" in this context means any company, firm, person or persons appointed to undertake work on behalf of the SIC. This clearly encompasses a wide spectrum of work activities e.g. from repairing a photocopier to working on a roof. Equally, the range and scale of risks varies and therefore it is necessary to ensure that adequate controls are in place to ensure the safety of both contractors and SIC employees.
123. The SIC acknowledges its duty to ensure, so far as reasonably practicable, the health and safety of contractors working at our places of work and carrying out work on our behalf. Contractors are also required to comply with health and safety legislation and where the work activities may directly affect our employees, co-operation and communication is especially necessary.
124. We will take all reasonable measures to ensure the competence of contractors working on our premises. The measures that will be taken will, of course, depend on the nature and level of risk associated with the contractor's activities, but may involve checking:
- Risk assessments and method statements
  - Professional qualifications
  - Membership of relevant trade associations
  - Health and safety policies and procedures
  - Accident statistics
  - History of HSE enforcement action against the Company
  - References from previous clients
  - Permit to work
125. A copy of a contractor's public liability insurance is acceptable for work where the evidence required above is not appropriate having regard to the extent of the work. e.g. unblocking a sink, checking a light fitting, fitting shelves.
126. Where a new contractor is engaged, or an existing one hired for major works, the staff member requesting the work should check the HSE website to establish if any enforcement

action has been taken against the contractor and whether there are any prohibition or improvement notices in place.

127. Contractors and sub-contractors must report to reception on arrival and must be met by a designated member of staff. This person is responsible for ensuring that the contractors are provided with the information and instruction necessary to protect them from the risks arising out of our activities. Where medium/ high risk activities are to be undertaken, details of supervisory arrangements are recorded on the risk assessment for the work.

#### *Construction Design and Management Regulations 2015*

128. Whilst we do not carry out construction projects as part of our business as a norm, should this change we shall apply a Contractor due diligence process.
129. We shall appoint the contractor as the Principal Contractor and ourselves as the Client. Agreeing that we shall have responsibility for health and safety for our business and they have responsibility for the health and safety of the construction project and together we shall liaise on health and safety matters and record this.
130. Contractors questionnaires can be found in VC – one for more than 5 employees (123357) and one for less than 5 employees (123358)
131. Our external Health & Safety adviser can be contacted for advice if it unclear if a Contractor due diligence process needs to be applied.

#### **Alcohol and drugs**

132. We recognise that the provision of a safe and healthy working environment may be compromised by those who misuse alcohol and drugs and that it may affect performance, conduct and relationships at work.
133. Against this background we promote the health and wellbeing of staff to minimise problems at work arising from the effect of alcohol or drugs.

#### **Smoking**

134. In accordance with the law, smoking is prohibited in all internal areas of the SIC's premises.

# Fire Safety Awareness Procedures

## Fire officers

Role	Staff member	Comments
Fire marshal	[REDACTED]	
Deputy fire marshal	[REDACTED]	
Fire wardens:		
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
Deputy fire wardens:		
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

## Fire equipment

135. The office is fitted with:

- smoke detectors
- fire alarm call points
- a fire alarm system
- designated fire exits that have been clearly signed and have emergency lighting in the event of a fire
- fire extinguishers / fire blanket
- fire doors to stairways and corridors

## Fire safety training

136. Induction of new staff should include an element of fire safety training delivered by a FAM. This will cover:

- location of fire exits
- location of fire extinguishers
- what to do in the event of a fire
- assembly point location

137. In addition, a FAM will email a reminder on an annual basis of all fire safety details and procedures.

## Fire alarm – weekly test

138. The CST tests the fire alarm [REDACTED]. The sound of the alarm during a test will usually last for up to [REDACTED]. No action need be taken. You should, however, report to the Administrators if you are aware that there is an area where the alarm cannot be heard clearly. In a drill or an emergency, the alarm will sound continuously.

## Emergency lighting – monthly tests

139. The CST tests the emergency [REDACTED]. This means that some of the lights will go off and the emergency lighting will come on. This will normally last for [REDACTED]

## Maintenance of fire alarm system

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

## Evacuations / fire drills

142. We will carry out test evacuations/fire drills [REDACTED]
143. You should always treat a fire alarm as if it were a real fire and must follow the instructions on exiting the building set out in paragraphs [below](#).
144. Fire drills will only be carried out when the Fire Marshal and Deputy Fire Marshal are both in the building. The Fire Marshal will call Thorntons on their main number – 01334 477107 - when there is to be a fire drill.

## Assembly point

[REDACTED]

## Fire risk audit and assessment

146. Our external Health & Safety adviser covers fire risk in its annual health and safety audit which may result in an action plan. A FAM is responsible for ensuring any issues identified in the plan are addressed appropriately and promptly.

147. A FAM will also carry out an annual Fire Risk Assessment.

### Fire alarm / call points

148. There are six fire alarm points as below which are tested on a rota basis each week.

Location	Call Point
[REDACTED]	1
[REDACTED]	2
[REDACTED]	3
[REDACTED]	4
[REDACTED]	5
[REDACTED]	6

### Fire extinguishers

Location	Equipment
[REDACTED]	<ul style="list-style-type: none"> <li>• 9 Litre Water extinguisher</li> <li>• 2 Kg Co2 Extinguisher</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>• 6 Litre AFFF Foam Extinguisher</li> <li>• 2 Kg Co2 Extinguisher</li> <li>• Fire Blanket</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>• 2 Kg Co2 Extinguisher</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>• 6 Litre AFFF Foam Extinguisher</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>• 2 Kg Co2 Extinguisher</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>• 6 Litre AFFF Foam Extinguisher</li> <li>• 2 Kg Co2 Extinguisher</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>• 6 Litre Foam Extinguisher</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>• 9 Litre Water Extinguisher</li> <li>• 2 Kg Co2 Extinguisher</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>• 6 Litre Foam Extinguisher</li> <li>• 2Kg Co2 Extinguisher</li> </ul>

Type	Label Colour	Safe For	Not Safe For
Water	Red	wood, paper and textiles	flammable liquid fires live electrical equipment flammable METAL fires
Carbon Dioxide	Black	flammable liquid fires live electrical equipment	wood, paper and textiles
Foam	Cream	wood, paper and textiles flammable liquid fires	live electrical equipment flammable METAL fires



## **Ensuring the safety of all people in the building**

149. All staff and guests entering the building must sign in on arrival, and sign out when leaving the building. There are two documents as follows:

### *Staff sign-in / out sheet*

150. This is located [REDACTED]. All staff should ensure that the sheets are kept up to date. Staff are required to sign in and out whenever entering or leaving the building.

### *Visitors' sign-in / out sheet*

151. The sheet is kept [REDACTED]. All visitors must be signed in when they arrive in the building. Staff expecting guests are responsible for ensuring their guests are signed in on arrival and signed out on departure. To maintain confidentiality, visitors should not sign themselves in, as previous visitor details can be seen on the sheet.

152. In the event of a fire the sign in/out sheets will be used by the Fire Marshal / Deputy Fire Marshal to check that everyone has evacuated the building.

153. You must take responsibility for your guests in the event of a fire, accompanying them to the nearest fire exit and to the meeting point. If you have 5 or more guests in the building for a meeting or a conference you must identify the nearest fire exits and meeting point to guests before commencing the meeting.

## **Disabled visitors**

154. Our office has good disabled access to the public rooms on the ground floor, but access is more difficult to other areas.

155. Visitors with disabilities may therefore find it difficult to evacuate the building in the event of fire. You should take this into account when planning meetings or other visits to the office. For example, do not leave any visitors with hearing impairments unattended in any room (we have audible, not visual fire alarms).

156. Try always to book meetings in Alexander for people with mobility difficulties. If you are in any doubt, ask the visitor if there any adjustments that we could make to make their visit possible and liaise with a FAM.

## **On discovering a fire in the building**

157. Raise the alarm immediately by activating the nearest red fire alarm call point by pushing the glass of the call point firmly. You should also warn anyone in the vicinity.

158. See the list above, or floor plan below for locations of fire alarm call points.

159. If a fire is discovered and there is no immediate call point, or you are trapped, where possible use the PA system on the nearest phone to alert other staff to the fire and to your location. Follow the instructions on the "In case of emergency card" attached to the phone and calmly read out the statement. Please familiarise yourself with this card as soon as possible rather than when an emergency occurs.



## Floor Plan

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*This complete section has been redacted*



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