



Health and Safety Policy

Version 1.0

July 2021

Version Control

Version	Owner	Reviewer	Changes	Approval date	Next Review
1.0	Monica Whitefield	Lyca Amichia	Initial version or first version uploaded on portal - see ESG share for historical information	07/2021	03/2022

Distribution - Controlled Copies

Controlled copies are issued by email by the Lead Health & Safety Officer, at each revision, to designated Controlled Copy Holders:

- Chief Executive Officer
- Safety Officers
- Online on intranet and in Facilities

Note: Copy Holders are responsible for ensuring that any electronic or hard-copy copies of the Policy held represent the latest revision as issued by the Lead Health & Safety Officer. Superseded versions should be removed.

Introduction - Guide to the Health and Safety Management System

This Policy presents the Newable documented Health and Safety Management System (H&SMS).

It is applicable to all the following Newable businesses:

- Management Services
- Advice
- Lending
- Ventures
- Equities Management Team

Newable's other businesses, including:

- NewFlex;
- Officio;
- Newable Capital Portfolio Companies; and,
- Synergy

maintain equivalent Health & Safety policies and management systems to meet their particular business requirements and legislative requirements in line with the sectors in which they operate.

The H&SMS is based on Compliance with requirements of UK Health & Safety Executive (HSE) guidance.

The principal elements of the H&SMS include:

- The Newable 'Health & Safety Policy Statement' which is endorsed by the Group Chief Executive Officer on behalf of the Newable Group Board;
- Organisation and Responsibilities' which summarise the H&S responsibilities for individual post holders; and,
- 'Management Procedures' which detail how the Policy is to be implemented through key defined tasks allocated to Directors, Managers and Safety Officers.

Policy

Health & Safety Policy Statement

Newable Limited recognises its moral and legal obligations to manage Health and Safety (H&S) and to promote good standards of H&S performance in all its activities.

Newable Limited is committed to:

- Maintaining safe and healthy workplaces for its employees;
- Avoiding, so far as is reasonably practicable, accidents, personal injury or harm to the health of Newable employees, visitors, clients, contractors and all relevant others;
- Compliance, as a minimum, with all relevant health, safety and welfare legislation.

Accordingly, Newable will act to:

- Set objectives for H&S and seek to achieve high standards;
- Communicate and consult with its employees to gain commitment to this Policy and its implementation;
- Document organisation, arrangements and procedures for H&S management which support the Policy within an H&S management system;
- Identify work hazards, assess risks to persons and implement risk control measures;
- Ensure that all employees are competent to discharge their H&S responsibilities and receive any necessary information, instruction and training;
- Provide a good quality working environment for the safety and welfare of employees;
- Select and control the work of Contractors to ensure that risks of harm to Newable employees and others from Contractors' activities are properly controlled;
- Co-operate and co-ordinate with other tenants to share information and promote good H&S standards within their operations;
- Monitor and record H&S performance;
- Periodically audit and review the effectiveness of the Policy and the H&S management system, and update these as necessary;
- Provide adequate resources to implement this Policy.

Management of Health & Safety is a prime responsibility of line management from the most senior executive to supervisory level. All directors and managers are responsible for ensuring that the Policy and the H&S management system are properly implemented. All employees are required to take reasonable care at work for their own health and safety and that of others, and to co-operate with management in all H&S matters.



This Policy Statement is to be displayed at all Newable business locations.

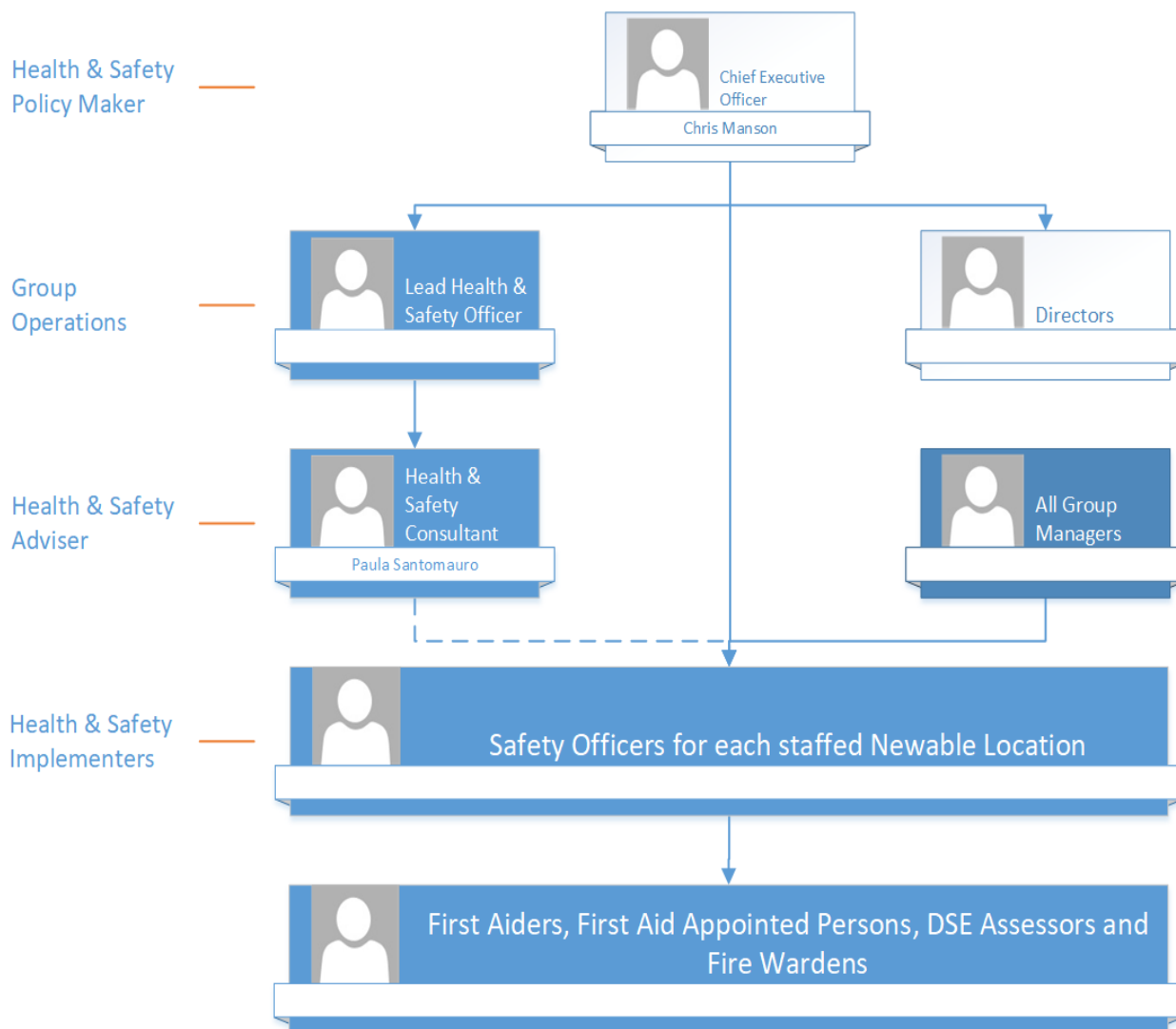
Approved by:

A handwritten signature in black ink, appearing to read "Chris Manson".

Chris Manson, Chief Executive, Newable Limited
28 April 2021

Organisation and Responsibilities

Organisation Chart



Responsibilities

H&S Policy Maker

The Newable Chief Executive Officer is the Board Director with particular responsibility for Health and Safety and acts in a 'Policy Maker' role for H&S management.

The Policy Maker's H&S responsibilities include:

- Periodically reviewing, updating and approving the H&S Policy Statement
- Approving H&S Objectives and Targets and plans for their implementation

- Ensuring that adequate resources are provided for H&S both at Group and site level
- Participating in Management Review of H&S reports, and ensuring that corrective action is taken for identified deficiencies
- Reporting to the Newable Group Board on H&S matters
- Promoting the Policy and a positive health and safety culture throughout Newable's business activities.

Safety Officers

Suitable persons are designated as having local responsibility to act as implementers of the H&S Policy for nominated Newable sites and are described elsewhere as 'Safety Officers'.

The responsibilities of Safety Officers, within their allocated sites, include:

- Achieve and maintain a sufficient level of understanding of Health & Safety to be able to discharge their responsibilities
- Responsibility for Health & Safety at their site
- Implementation of detailed plans, performance standards and procedures within the H&S Management System
- Completion of risk assessments and implementation of risk control measures
- Safety inspections and Active Monitoring
- Ensuring satisfactory fire precautions, emergency evacuation and first aid arrangements
- Considering H&S standards and performance in the selection and monitoring of Contractors
- Providing induction training and identifying other training needs
- Reporting to the Lead Health & Safety Officer on H&S performance on a routine basis, and to advise of incidents or deficiencies
- Maintaining full records and reports relating to H&S
- Submit Health & Safety Returns and Active Monitoring as requested
- Complete actions and output from Fire and General Risk Assessments in a timely manner
- Liaise with the H&S Adviser to carry out and implement any actions arising from visits or advice given
- Undertake specified H&S roles at times such as Chief Fire Officer, First Aid Appointed Person etc.

All Directors

All Directors who are Newable Board members are responsible for:

- Formally and publicly accepting their collective role in providing H&S leadership,

with each Board member accepting their individual role accordingly

- Ensuring that all Board decisions reflect the aims of the H&S policy
- Recognising their role in engaging the active participation of staff in improving H&S
- Ensuring that they are kept informed of relevant H&S management issues.

All Managers / Supervisors

All Managers and Supervisors within the Newable organisation (including Executive Directors) have line management responsibility for H&S matters.

The responsibilities of all Managers and Supervisors include:

- Familiarising themselves with the Policy and all relevant parts of the H&S Management System, performance standards and procedures and acting to ensure that all staff under their control comply
- Ensuring that H&S requirements are considered in recruitment and staff appraisal and that H&S training needs are identified and met
- Promoting improved awareness of H&S and continuous improvement
- Ensuring that there is effective communication and consultation on H&S with the work force
- Monitoring H&S performance within their areas of responsibility, identifying and reporting deficiencies and possible improvements
- Ensuring that accidents and incidents are properly recorded and reported, and that all statutory reporting requirements are fulfilled
- Ensuring that the selection and monitoring of Contractors gives proper regard to H&S standards and performance.

All Employees

All employees are required to:

- Take reasonable care for their own safety and that of others
- Co-operate with Newable management, including designated Safety Officers
- Not misuse any safety devices and equipment
- Make correct use of work equipment and follow guidance from training, in risk assessments and notices
- Report hazardous conditions and any safety shortcomings to their line manager.

H&S Adviser

The responsibilities of the H&S Adviser are defined on appointment and by subsequent instructions. Responsibilities may include:

- Conducting initial status review of existing arrangements
- Providing recommendations for remedial action and improvement

- Developing and maintaining the documented H&S management system
- Producing plans to implement the Policy and the defined Objectives and Targets
- Monitoring developments in H&S legislation, standards and good practice and disseminating this information
- Preparing reports on H&S performance
- Devising initiatives to promote improved awareness of H&S
- Conducting compliance audits
- Providing advice, on request, on matters of H&S management
- Participating, on request, to support Newable staff in activities such as risk assessment.

First Aid Appointed Persons

Designated Appointed Persons are responsible for:

- Maintaining contents of First Aid Boxes
- Ensuring adequate First Aid provision is available on site
- Ensuring First Aid information is available to all employees
- Forwarding Accident Book forms for investigation to Lead Health & Safety Officer
- Working with Lead Health & Safety Officer on induction and meetings.

First Aiders

Trained First Aiders, where available, are responsible for:

- Providing First Aid assistance
- Completing Accident Book forms.

Fire Wardens

The responsibilities of Fire Wardens are to:

- Ensure that all persons promptly evacuate their area of the premises
- Sweep area before leaving themselves using the system in place for that site as designated by the Fire Risk Assessment.
- Assist the Chief Fire Warden at the Assembly Point
- Be familiar with the local Fire and Emergency plan.

Contractors

The responsibilities of Contractors appointed to work at Newable premises include:

- Compliance with all applicable legislation, codes of practice, standards and specifications relevant to their activities
- Employing only competent persons, with adequate supervision and ensuring that

safe systems of work are applied

- Advising Newable of their policy and arrangements for H&S management
- Notifying Newable of hazardous activities and hazardous substances and their risk control measures, providing method statements where appropriate
- Providing further information on H&S matters, on request
- Co-operating with Newable and others to ensure that common areas of sites remain as safe places of work
- Observing site rules e.g. for housekeeping, waste disposal and emergency procedures
- Providing information requested for Contractor Selection and Management
- Complying with Newable induction and safety procedures for Contractors
- Providing Risk Assessments, Safe Systems of Work and Method Statements for work undertaken
- Ensuring adequate insurance is available at all times and is appropriate for work undertaken
- Providing Permit to Work information for works deemed to be high risk by Newable that are subject to Newable's Permit to Work system.

Visitors

Visitors are responsible for:

- Taking reasonable care for their own safety
- In particular, taking note of information given to them concerning hazards and emergency procedures and complying with safety instructions
- Listening to any instructions given by their host or Fire Wardens in the event of an evacuation
- Reporting any accidents or incidents to their host that occur whilst they are on site.

Management Procedures

Policy, Objectives and Planning

Policy Statement

The Group Chief Executive Officer shall sign and date the approved H&S Policy Statement annually, signifying commitment on behalf of the Newable Group Board.

The Group Chief Executive Officer, assisted by the Lead Health & Safety Officer, shall review the H&S Policy Statement at least once annually and, where necessary, shall ensure that the Policy is updated to take account of:

- changes to legislation or standards
- changes to Newable operations, organisation and responsibilities
- improvements identified through Management Review or other means.

Safety Officers shall ensure that:

- the Policy Statement is displayed at all locations where Newable staff work
- new staff joining Newable are made aware of the Policy Statement.

Objectives and Targets

The Lead Health & Safety Officer shall periodically prepare a series of Objectives and Targets for H&S, for approval by the Newable Chief Executive Officer.

Objectives and Targets will normally be set once a year, for a 12 month period ahead. The Lead Health & Safety Officer will perform periodic reviews of the set targets for approval by the Chief Executive Officer.

The Objectives and Targets shall aim to improve levels of compliance with legislation and the Newable H&S Management System, and to improve H&S performance generally. They shall allocate primary responsibilities for action and shall, wherever possible, be 'SMART':

- Specific
- Measurable
- Achievable
- Relevant
- Time bounded.

The Lead Health & Safety Officer shall ensure that copies of the approved Objectives and Targets are issued to all Safety Officers with allocated responsibilities.

Progress in achieving Objectives and Targets will be monitored by the Chief Executive

Officer and formal review shall take place.

Resources

The Chief Executive Officer shall review resource requirements identified in the Objectives & Targets Plan and shall ensure that adequate provision for H&S is included when Newable budgets are determined.

The Lead Health & Safety Officer shall advise on budget provision for H&S consultancy and other H&S costs.

Records

- Master copy of approved Policy Statement, to be held by the Lead Health & Safety Officer
- Master copy of approved Objectives and Targets, to be held by the Lead Health & Safety Officer
- H&S Budget for current financial year.

H&S Management System Development

The Lead Health & Safety Officer shall develop and maintain an H&S Management System (H&SMS) Manual.

The H&SMS Manual shall document how Newable will implement the H&S Policy and shall include:

- H&S Policy and Objectives
- definition of Organisation and Responsibilities for H&S
- a series of Procedures.

The H&SMS Manual shall be developed and maintained as an indexed 'controlled document', comprising subsections each with clearly defined revision status, numbering and dates of issue.

Distribution

The Lead Health & Safety Officer shall:

- hold a complete current Master copy of the H&SMS Manual
- upload an electronic copy of the Manual to the Intranet which will be the current one to be used by all parties.

Revisions

The Lead Health & Safety Officer shall ensure that component parts of the H&SMS are revised as necessary, following:

- changes in legislation or standards
- changes to Newable operations, organisation and responsibilities
- improvements identified through Management Review or Active Monitoring
- New Best Practice.

The Lead Health & Safety Officer shall ensure that each revision is uploaded to the Intranet on a timely basis.

All Copy Holders shall ensure that they only use the latest version on the Intranet and seek guidance from the Lead Health & Safety Officer if in doubt.

Records

- Master copy of H&SMS Manual, held by the Lead Health & Safety Officer
- Revision Record within the H&SMS Manual.

Legislation

Identification of Applicable Legislation

The H&S Adviser will:

- monitor developments in new or forthcoming H&S legislation, HSE Codes of Practice and Guidance
- identify where such legislation or guidance has implications for H&S management in Newable and initiate action as appropriate.

Access to Legislation

The Lead Health & Safety Officer shall ensure that appropriate legislation/guidance is accessible to Newable.

Dissemination

The Lead Health & Safety Officer shall:

- advise on the application of current and forthcoming legislation to Newable activities
- advise the Group Chief Executive Officer of legislation/guidance changes affecting Policy and/or with cost implications; and where appropriate, issue H&S Safety Briefings to inform the Chief Executive Officer and Safety Officers of new

requirements to assist in the management of their offices.

Competence and Training

Job Description/Specification

All Managers shall ensure that, where relevant, Job Descriptions/Specifications include H&S criteria.

This also applies for all staff with specific H&S management roles including the Chief Executive Officer, as the Board member with responsibility for H&S and Safety Officers.

It also applies for any staff employed where their duties require special qualifications or experience with H&S implications e.g. maintenance workers or security guards where certificates of competency or minimum health requirements may be essential requirements. Risk Assessments and training in resultant control measures must be provided to these persons.

The Lead Health & Safety Officer shall ensure that designated Safety Officers receive training relevant to their responsibilities, including an introduction to H&S legislation, H&S management systems and risk assessment. This training will normally be obtained from a specialist external training organisation such as IOSH although some can be provided in-house by the Lead Health & Safety Officer and H&S Adviser.

Some additional training will be provided by the Newable H&S Adviser such as DSE Assessor Training, Fire Warden Training, Appointed Person training, Maternity Risk Assessor Training, Manual Handling training etc.

Recruitment and Placement

All Managers shall ensure that candidates for recruitment or placement (promotion, transfer, relocation) to posts where H&S criteria are specified are properly evaluated against the H&S criteria through:

- Interview
- Review of certificates of competency (where appropriate).

The evaluation process shall be used to identify any training requirements necessary.

Staff Appraisal

All Managers should use staff appraisal to discuss any individual Health and Safety concerns of staff which may not have come to light otherwise, for example, through risk assessment exercises. H&S concerns noted may require management action.

Examples might be:

- Reported stress
- Safety concerns of new or expectant mothers
- Musculoskeletal disorders
- Lone working.

When conducting staff appraisal for those with specified H&S duties, Managers shall ensure that H&S competency and performance are considered. In particular, training needs shall be considered.

Induction Training

All Managers shall ensure that all staff joining Newable or being relocated are given Induction Training on H&S at their local office as soon as practicable after joining by the Safety Officer.

Induction Training shall normally be conducted by one of the designated Safety Officers and shall include, as a minimum, items on the group Induction Training Record. New starters shall also be shown the location online of the H&S Information.

All new joiners will be shown the location of the staff intranet which contains all relevant H&S policies, the location of the Health & Safety Noticeboard and how to contact the Safety Officer.

Each person receiving Induction Training shall be required to sign to confirm their understanding.

First Aid Training

Safety Officers shall ensure that designated First Aiders:

- Complete a First Aid at Work course (duration usually 3 days)
- Attend a refresher course every 3 years thereafter.

Other First Aiders and Appointed Persons may be given shorter training such as Emergency First Aid at Work.

Other H&S Training

All Managers shall consider the competence of their staff and shall ensure that they receive any additional training necessary. This may require attendance at external or internal training courses.

General training may be given by the Safety Officers. Specific training shall be given by appropriate competent external agencies or the Newable H&S Adviser.

Communication Dissemination of Information

The Lead Health & Safety Officer and Safety Officers have responsibility for disseminating appropriate H&S information to:

- Newable Managers and Staff
- Contractors.

Information should be given or confirmed in writing wherever possible. Information may also be given in meetings with recorded minutes or notes.

Some specific requirements for communications are set out below:

Safety officers preparing and submitting a Return (report performed monthly logging accidents, risk assessments etc)

Reports by Safety Officers

The designated Safety Officers shall report significant events e.g. accidents or areas of concern to the Lead Health & Safety Officer. This may be done by email or phone.

Additionally, Safety Officers will prepare and submit a Return - either once monthly or once quarterly - in respect of the sites for which they have H&S responsibility.

The Safety Officer shall send a copy of the Report by email to the Lead Health & Safety Officer, and retain a copy on file.

Running action lists will be provided by the Lead Health & Safety Officer to each Safety Officer to help them manage their responsibilities.

Annual Report

The Lead Health & Safety Officer shall draft a written Annual Report to include:

- A summary of H&S performance derived from Safety Officers' Monthly Reports, Action Lists and own visits and inspections
- Review of organisation and resources for H&S
- Status report on progress against the Objectives and Targets
- Areas of concern and recommendations for improvements.

Meetings - General

The Group Chief Executive Officer shall ensure that senior management meetings include H&S as a standard agenda item.

Managers and Safety Officers shall use other routine management meetings as a forum:

- To disseminate information about H&S matters
- To consult with colleagues on H&S matters and receive comments from them.

Safety Officers may from time to time convene Safety Briefing Meetings to brief groups of staff and discuss H&S matters when necessary. Records shall be kept of such meetings.

H&S Meetings

The Chief Executive Officer and Lead Health & Safety Officer shall agree a schedule and arrange formal H&S Meetings accordingly, or as required.

Meetings may include:

- an annual Management Review meeting including the Chief Executive Officer.

Formal H&S Meetings provide a communication forum to:

- Disseminate and exchange information on H&S, including new legislation
- Review areas of concern identified in Safety Officer's Reports
- Review reported accidents
- Report back on progress on Actions
- Determine management actions and resources required to achieve Objectives & Targets
- Record proceedings as Minutes, distributed to all Safety Officers and the Chief Executive Officer.

H&S Liaison Visits

The Lead Health & Safety Officer shall visit each of the main staffed Newable sites on a regular basis to provide support and guidance to the Safety Officers and inspect sites for areas of improvement.

Liaison Visits shall be used for informal discussion with the Safety Officer on problem areas specific to each site and progress in implementing H&S procedures, with a site tour.

The discussions should lead to an agreed action list and identify where extra support may be required.

Notices

The Safety Officers shall ensure that the following notices are prominently displayed on sufficient Health & Safety Boards and kept up to date at all staffed locations:

- Statutory HSE Poster
- Copy of Employer's Liability Insurance certificate
- Building Evacuation Procedures
- First Aid information
- Newable H&S Policy Statement.

Employee Involvement

All Managers shall encourage staff to:

- Participate in H&S activities which are relevant
- Freely report any incidents or safety concerns
- Make suggestions for improved safety.

Records

- Annual H&S Reports
- H&S Staff Handbook
- Minutes of H&S Meetings
- Action Lists for each site
- Safety Officer Returns.

Risk Control

Hazard Identification and Risk Assessment

Safety Officers shall ensure that hazards in the workplace are identified for all activities, at all locations, and that a General Risk Assessment is undertaken annually for each site.

For Hazards that require further assessment, and which are not covered by the site specific General Risk Assessment, Safety Officers and the Lead Health & Safety Officer shall conduct a Risk Assessment together.

Communication of Risk Assessment Findings and Action

Safety Officers should:

- Communicate the results and advise all persons directly affected of the findings of Risk Assessments
- Initiate any actions necessary to effect risk control measures which are determined

by the Risk Assessment on a timely basis.

Special Risk Assessments

Where the General Risk Assessment indicates there may be risk of harm arising from a particular hazard and there is no generic risk assessment for this hazard, a specific Risk Assessment will be required.

Chemical/Substance Assessment

For most Newable sites, engaged solely in non-manual office-based work, there are no hazardous substances used by Newable personnel in the course of work that require specific COSHH assessments. The presence on the premises of any hazardous substances and their use, storage and handling are usually considered in the General Risk Assessment.

Electrical Safety

Safety Officers are responsible for ensuring that Fixed Installation Testing and PAT testing is undertaken at the correct times.

Staff are responsible for checking and reporting any electrical equipment that looks unsafe and/or damaged such as leads, plugs, sockets etc during their regular inspections.

All staff including home and mobile workers should inspect their electrical equipment at regular intervals and report any faults to their Safety Officer.

Manual Handling

Generally, Newable personnel are engaged solely in non-manual office-based work where there are no routine lifting/carrying tasks that require manual handling assessments. Minor tasks of manual handling that may occur in the office are considered in the General Risk Assessment.

Some Newable Staff such as marketing, IT, events, and Client Suite staff routinely do more strenuous manual handling. They therefore require a risk assessment to be completed which in turn may lead to specific training and guidance.

Access Equipment

All access equipment, stepladders, kickstools and leaning ladders in Newable sites will be documented on a site specific ladder register and identified by a number on them.

They will be inspected at proportionate intervals to ensure their safety for staff to use.

The use of leaning ladders or other access equipment is not permitted unless permission has been sought and a risk assessment been undertaken and control measures implemented.

Events and Activities

Risk assessments for events and activities should be carried out by someone who is knowledgeable about the activity being assessed. In most circumstances this will be the person who is responsible for organising or managing the activity, for instance whoever is arranging the event or awayday.

If this person is not competent to do this they may seek advice from the Safety Officer or H&S Adviser.

If awaydays or events include activities organised by another company, the company who are managing the activities should firstly provide Newable with their risk assessment for review. The Newable person can use this to complete their own risk assessment or request further information or amendments if they do not feel it is sufficient.

Asbestos Management

Asbestos surveys will be done on all sites older than 2000.

Specialist assistance is required to conduct an asbestos management survey and to make recommendations on any treatment of asbestos present.

An Asbestos Management Plan will be implemented for any site where there is or presumed to be Asbestos Containing Materials.

Only licenced contractors will be used to remove or work with asbestos.

The Safety Officers are responsible for owning the Asbestos Management Plan in their office.

Fire Risk Assessment

Safety Officers or the H&S Adviser shall:

- Carry out and record a **Fire Risk Assessment** for all Newable premises – **both** premises where Newable personnel work **and** premises controlled by Newable (the common parts of multi-occupied premises whether or not Newable personnel work there)
- Ensure that fire precautions identified in the risk assessment are provided and

maintained.

Display Screen Equipment (DSE) Assessment

Safety Officers shall carry out and record DSE Assessments for all workstations using display screen equipment in their site. They must be trained as DSE Assessors.

All Managers shall ensure that staff whose work includes regular use of computer screens have eyesight testing, on request, and are either provided with vouchers to cover the cost or have the cost reimbursed by the company.

Where new spectacles or contact lenses are prescribed as a result of work with screens, where this was not a pre-existing prescription Newable will contribute towards the costs of tests and spectacles.

Cardinus software will be used for training and assessments.

Homeworking Risk Assessment

Formal Homeworkers shall be asked to complete a Home Working Risk Assessment form.

Safety Officers shall collate and review completed assessments.

New & Expectant Mothers

Safety Officers shall carry out and record Assessments for all staff who are known to be pregnant or have recently given birth. This should be carried out as soon as the person advises Newable that she is pregnant and reviewed, as necessary, during later stages of pregnancy and after giving birth. Safety Officers must be trained maternity Risk Assessors.

Lone Working

Lone working will be avoided wherever possible.

Managers will put arrangements in place for safe lone working using control measures in a Risk Assessment and guidance that is available.

Young Persons

The presence on any site of young persons (aged 16-18) will be notified to HR in advance for their visit. The local Safety Officer will also be notified.

Arrangements will be put in place for their safety using the Young Persons induction, Risk Assessment and Safety Briefings.

The manager in charge of the young person is responsible for making adequate arrangements and notifying those who need to know.

Young persons will not be permitted to lone work at any time.

All Managers shall ensure that any young persons under the age of 18 are given adequate supervision until they have developed the necessary competence to work unsupervised.

All Young Persons will receive a specific Health & Safety Induction from their Manager tailored to their needs.

All Managers shall ensure they have read all relevant documents associated with Young Persons.

Disabled Risk Assessments

The needs of disabled persons will be discussed on recruitment and suitable arrangements put in place for their safety and well-being while at Newable using risk assessment and discussion methods.

This also applies to staff who suffer temporary disablement or become disabled in any way during their time at Newable.

Managers are responsible for notifying their Safety Officer of the above instances.

Water Risk Assessment and Management

All sites, where deemed necessary, will have a Water Risk Assessment undertaken and Management Plan put in place to control the risk of Legionella bacteria.

Review of Risk Assessments

Safety Officers shall maintain files of all Risk Assessments for each site and review them for continued applicability at least once every 12 months or where there has been a significant change in work procedures.

Guidance will be sought from the Health & Safety Adviser as necessary.

Records

- Risk Assessment files, held by Safety Officers.

First Aid, Health & Welfare

First Aid

Safety Officers shall ensure that suitable and sufficient First Aid facilities are provided at all locations. As a minimum, all workplaces where Newable staff are based shall be provided with a First Aid box and an Accident Book.

Additional facilities shall be provided where found necessary through Risk Assessment.

Appointed Persons

Safety Officers shall ensure that at least one Appointed Person is designated for each location where Newable staff are based.

Designated Appointed Persons are responsible for:

- Maintaining contents of First Aid Boxes
- Ensuring adequate First Aid provision is available on site
- Monitoring certificate expiry dates
- Ensuring First Aid information is available to all employees

Note: Only trained First Aiders may give First Aid assistance.

First Aiders

Where First Aid Risk Assessment shows it necessary, Safety Officers shall designate First Aiders.

First Aiders must complete First Aid training (or refresher training) every 3 years.

Staff, acting as Appointed Persons, may be given shorter (1-day course) training in Emergency First Aid, with refresher training every 3 years.

Details of trained First Aiders will be displayed on office Health & Safety noticeboards and on the Intranet.

Welfare Facilities

All Safety Officers and Managers shall ensure that workplaces provide a safe working environment.

Staff shall be provided with:

- Well maintained and regularly cleaned working premises
- Adequate working space, heating, lighting and ventilation
- Sufficient washing, changing and toilet facilities
- Drinking water facilities
- Facilities for rest breaks and to eat meals.

Emergency Planning

Emergency Planning

The Crisis Management Team (CMT) shall ensure that sufficient Emergency Planning is applied across Newable and that appropriate Procedures are developed. This shall include consideration of fire and other potential risks e.g. explosion, terrorism, vandalism, flooding etc.

Fire Emergency Evacuation Procedures

Safety Officers shall ensure that Building Emergency Evacuation Procedures are established, documented and clearly displayed at all locations.

Emergency Evacuation Procedures shall clearly define:

- Alarm signals
- Evacuation Routes and Exits
- Muster Areas
- Actions by all staff in the event of an emergency
- Special responsibilities e.g. for Fire Wardens or Security staff.

Responsible Person

Safety Officers shall also act as the site Fire Responsible Person with a general responsibility for ensuring that fire precautions are maintained in compliance with the Fire Risk Assessment. The Overall Responsible Person is the Chief Executive Officer.

This applies both for:

- Newable staffed buildings for which they are responsible
- other Newable premises, for those parts controlled by Newable.

Fire Wardens

As site Responsible Person, the Safety Officer is responsible using the Fire Risk Assessment, to arrange a system of clearance. Fire Wardens are required to assist in

this activity. Safety Officers shall ensure that:

- Suitable persons are formally nominated to act as Fire Wardens
- They are provided with practical and *site specific training* in fire precautions, safety and evacuation
- Fire Wardens' duties in the event of an emergency and limits on these duties are clearly defined in writing.

Fire & Emergency Equipment - Provision

Safety Officers shall ensure that:

- Sufficient fire/emergency equipment is provided;
- Equipment fully complies with requirements specified within the Fire Risk Assessment. They shall seek a survey if any modification or changes have been made to the building since the equipment was installed

Fire and emergency equipment may include:

- Alarm system - with control panel, alarm sounders and call points
- Smoke/fire detectors
- Fire extinguishers and Fire Suppression systems
- Fire blankets
- Hose reels
- Sprinkler systems
- Emergency escape lighting
- Automatic door release systems.
- Emergency Lighting

Fire & Emergency Equipment - Maintenance & Testing

Safety Officers shall ensure that:

- Fire/emergency equipment is visually checked as part of Fire Active Monitoring Inspections
- Fire/emergency equipment is periodically inspected and tested by competent Contractors
- Fire/emergency equipment is maintained in accordance with legislation
- Fire alarms are tested at least once per week (actuation/audibility test).

Emergency Lighting will be checked every month by the Safety Officer and a full three hour discharge undertaken each year by a competent electrical contractor.

Drills

Safety Officers, assisted by Fire Wardens, shall conduct evacuation drills to test the effectiveness of emergency procedures. Drills should typically be held at least twice per year.

Safety Officers shall liaise with other site occupiers to secure their responsible co-operation in safety drills including landlords.

Signs

Safety Officers shall ensure that sufficient signs are provided to comply with statutory requirements and to meet requirements identified in risk assessments.

All signs must comply with current regulations i.e. show 'pictograms' and be the correct shape and colour:

Typically, signs should be provided to clearly mark:

- Emergency Exit locations
- Emergency Evacuation routes
- Fire Points (extinguishers and hose reels)
- Manual Alarm Call points
- Fire doors
- First Aid points.

Contractors

Selection of Contractors

All Managers and Safety Officers who select and appoint Contractors are responsible for ensuring that selected Contractors have sufficient understanding and competence in H&S management, appropriate to the scope of work using the Group Contractor Selection process.

Managers and Safety Officers shall:

- Require Contractors tendering for work for Newable to submit H&S information for review using Contractor Selection Questionnaire
- Consider H&S information submitted as part of the contractor selection process
- Require tenderers to provide additional H&S information where their initial submissions are inadequate.

The questionnaire takes into account the scope of work to be done, the level of safety risk involved and the relevant competency of the contractor. Competent persons should review the return before the Contractor is engaged. The questionnaire must be proportionate to the work being undertaken.

Safety Officers shall assess or provide advice to other Managers on assessing H&S information submitted by contractors.

Information to Contractors

Managers and Safety Officers shall ensure that Contractors working at Newable premises are provided with necessary information to ensure that they can perform their work safely. This will include:

- Contactor Induction
- Contractor Site Information
- Information on particular hazards that the Contractor may encounter (e.g. asbestos present, buried cables etc.)
- Information about activities by Newable personnel or others which may affect the Contractor
- any particular instructions or restrictions on how the Contractor should perform the work
- Information on Newable Permit to Work system.

Safety Officers shall liaise with Contractors to ensure that they have received and understood necessary H&S information from Newable.

Information from Contractors

Contractors are required to provide the following for the work they undertake on behalf of Newable:

- Risk Assessments
- Safe Systems of Work
- Method Statements
- Supervision arrangements.

Monitoring of Contractors

Managers shall monitor the work of Contractors to ensure that they work safely.

In particular, Managers shall:

- Ensure that Contractors comply with any written and approved Method Statements

they have issued.

- Ensure that control measures specified in their Risk Assessments are adhered to
- Ensure that Contractors comply with any instructions/restrictions placed on them by Newable
- Report any observed unsafe acts or unsafe conditions to a responsible person in charge of Contractor personnel, for corrective action to be taken
- Assess the overall H&S performance of Contractors with a view to their use in future contracts.

CDM Regulations

Particular statutory requirements apply to certain construction projects which come within the Construction (Design & Management) Regulations 2015, known as the CDM Regulations.

Managers and Safety Officers shall ensure that such construction projects are compliant with CDM Regulations.

Waste Management Storage, Handling and Segregation

Managers and Safety Officers shall ensure that:

- Sufficient and properly marked separate containers are provided for general commercial waste, hazardous materials, materials for recycling, and special wastes
- Waste materials are regularly (at least once daily) cleared from workplaces, properly stored and segregated prior to collection and disposal

In the unlikely event that the special substances exist or require disposal, specialist guidance should be sought.

Pest Control

Safety Officers shall arrange for competent authorised pest control contractors to be brought in where there is evidence of infestation.

Security and Visitors Security

Safety Officers shall consider security hazards to personnel and premises as part of the General Risk Assessment.

A specific Security Risk Assessment should be completed if the security hazards cannot be managed under the General Risk Assessment.

Safety Officers shall ensure that security measures are properly maintained and that security equipment is regularly inspected and tested.

Visitors

All Visitors shall be required to report to Reception where applicable, on arrival at sites with Newable staffing.

The Receptionist, where applicable, shall ensure that Visitors are:

- Logged in the site's Visitors Book on arrival
- Met and escorted by the person that they are visiting
- Logged out on departure.

All Newable personnel receiving Visitors are responsible for:

- Meeting their Visitors at Reception and escorting them whilst they are on Newable's premises
- Advising Visitors of Emergency Evacuation Procedures, any particular H&S hazards to which they may be exposed and the risk control measures that they should observe
- Ensuring that Visitors observe risk control measures and comply with any H&S instructions given.

At sites where there is no permanent Newable staffing and/or no Reception facility, Newable personnel shall make arrangements to meet Visitors and escort them whilst on the premises.

Formal Homeworkers Responsibilities

The same Health and Safety legislation applies to Formal Homeworkers as to those who work at a Newable site.

A formal Homeworker is either:

Someone contractually employed by Newable to work at home, or

- Someone who Newable has formally agreed will work from home for an extended period of time.

Homeworker Risk Assessment

The Formal Homeworker is responsible for completing the Homeworking Risk Assessment and returning it to the local Safety Officer.

The Safety Officer will review and discuss the answers to the questions in the risk assessment with the H&S Adviser and with the home worker.

Based on the discussion and forms, the Safety Officer will:

- Decide what controls, if any, are necessary to ensure the home worker is safe when working at home
- Advise the manager what action is to be taken and who is responsible for organising it.

If the Safety Officer identifies that actions are necessary they will:

- Provide advice and guidance to the home worker on any specific risks that need to be controlled
- Meet the home worker to discuss the issues and ask the individual to resubmit new forms following investigation
- Decide whether an in-depth assessment at the home is required
- Disseminate actions to ensure the home worker's safety
- Assist in the purchase of any equipment that is required.

Homeworking Equipment

Newable will provide, when requested, support for a laptop or computer and related DSE equipment, subject to appropriate line manager approval. Newable may also provide other related IT equipment.

Regular review of formal home working assessments

The home worker should review their forms if new information comes to light or if there has been a change in the home worker's job, equipment or house that could materially affect the results. The Safety Officer should also review it if an accident, injury, ill health or near miss occurs.

The home worker or their manager should inform the Safety Officer if there are any reasons for a review.

Information and guidance for home workers

The Safety Officer is responsible for providing sufficient information to home workers. This information and guidance is available online.

Inspections

Periodic Safety Inspections of Newable Offices

Safety Officers shall ensure that regular inspections are conducted the Newable occupied areas

Safety Inspections should be:

- A tour and visual inspection of the premises with the aim of spotting hazards that require action to prevent possible accidents
- Carried out on a regular basis as agreed with H&S Adviser
- Recorded and SMART
- Using the inspection form relevant to their office as agreed with H&S Adviser.

Environmental Monitoring

Where Risk Assessments or Inspections subjectively indicate there may be significant risks of harm from environmental hazards e.g. noise (at a level of 80 dBA or greater), dust or fumes, Safety Officers shall ensure that environmental monitoring measurements are carried out and the results recorded. Specialist contractors shall be employed where necessary e.g. for air sampling or noise surveys. Subsequent arrangements will be put in place.

Inspection and Maintenance

Safety Officers shall ensure that plant and equipment in their buildings are periodically inspected and properly maintained by competent persons if this falls under their lease responsibilities.

This may include:

- Fixed and portable electrical equipment
- Lifts
- Boiler systems
- All plant and equipment under their control.

All contractors undertaking maintenance, test and inspection work are subject to Newable Contractor Selection and Management.

- On the electrical installation, this must be carried out by trained and qualified electricians

- On gas fittings and appliances, this must be carried out by trained and qualified gas fitters
- On lifts, this must be carried out by Specialist contractor personnel.

Statutory Test and Examination (STE)

Lifting Equipment, Gas Systems, Pressure Systems and Electrical Installation are all subject to Statutory Test and Examination which is undertaken by a competent party other than the maintenance contractor. All items requiring Statutory Examination should have a Thorough Examination Schedule drawn up by a qualified third party.

Electrical Installation Testing

Testing of the fixed parts of the electrical installation (all power and lighting circuits, switchgear, circuit breakers / fuses and sockets) is required when the installation is new and at intervals of 5 years thereafter. Safety Officers should ensure that this testing has been completed and certificates of testing are reviewed for recommendations then held on file. Any remedial actions must be completed. This is statutory.

Lift Inspection and Testing

All lifts should be inspected and tested periodically every six months by competent persons. Safety Officers should ensure that this inspection and testing has been completed and certificates of testing are held on file or in a service record logbook. Remedial actions must be completed. This is statutory.

Gas Boiler Inspection

Gas fired boilers must be inspected and tested at least once annually. This must be done only by a Gas Safe registered engineer. Safety Officers should ensure that this inspection and testing has been completed and certificates of testing are held on file.

PAT Testing

Safety Officers shall ensure that all portable electrical equipment is subject to periodical Portable Appliance Testing (PAT) by a competent person. Frequencies are dependant on usage and type of equipment.

All equipment should be marked with a dated sticker after testing. Any faulty equipment found should be taken out of use and reported for repair or replacement.

Equipment should be visually checked by users as part of daily user checks. Safety Officers will check equipment as far as practical during their inspections.

Homeworkers are responsible for checking their Newable equipment at home and

reporting any unsafe items for replacement.

Safety Officers are responsible for letting the Homeworker know in reasonable time when the PAT testing is due to take place.

Records

Equipment inspection/test reports/certificates.

Reactive Monitoring Accident Book

Safety Officers shall ensure that:

- All injuries and First Aid Treatments, however minor, are recorded in the Accident Book maintained at each location.

Incident Reporting - Internal

Safety Officers, and all Managers, shall ensure that:

- All accidents and incidents, except for minor injury accidents which may simply be recorded in the Accident Book, shall be reported using Safety Officer Monthly Returns
- A copy sent to the Lead Health & Safety Officer for information and submitted on monthly/quarterly Returns for possible further investigation

Accidents and incidents may include:

- An accident where a Newable staff member (or a Visitor to Newable) is injured
- A dangerous incident occurring although no one is injured (i.e. a 'Near Miss')
- Illness contracted in the course of work.

Where necessary, the report form should be filled in as far as possible by the injured person or a witness to the accident/incident.

If accident investigation is deemed necessary to identify root causes and avoid a reoccurrence, the Line Manager of the person involved is then responsible for completing the Investigation Form with assistance from the Safety Officer.

Note: This procedure is intended for reporting incidents affecting Newable employees and Newable's Visitors. However, it is advisable to also make a record of any incident occurring in common parts of Newable managed premises even if no Newable personnel are involved.

RIDDOR Statutory Reporting

Some incidents must also be reported to the Enforcing Authority in accordance with RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations, 2013). This includes accidents to members of the public, some musculoskeletal disorders and absences over 7 days as a result of work related accident or ill health.

Report forms can be completed online at www.hse.gov.uk/riddor

Alternatively, for reporting fatal and specified injuries only, reports can be made by phone:

Tel: 0845 300 9923

Note: Newable is responsible for reporting incidents affecting Newable employees and Newable's Visitors. However, Newable should also report incidents occurring in common parts of the premises even if Newable personnel are not involved.

Incident Investigation

Where serious injury has occurred, or potentially might occur if the incident recurred, the Lead Health & Safety Officer will carry out a formal investigation together with the Safety Officer and departmental management.

Investigation for major incidents may include:

- Taking witness statements
- Gathering documentary evidence including sketches or photographs
- Preparing a detailed Investigation Report
- Assisting Police, HSE Inspectors or others conducting official investigations.

Documentation

Safety Officers

The designated Safety Officers shall set up and maintain filing systems to hold H&S information and records for their areas of responsibility in an orderly and readily accessible manner.

The Lead Health & Safety Officer, shall maintain master copies of documents forming parts of the H&S Management System.

Forms

A Document Register is available for all Newable documentation and is held online for easy access for the Safety Officers.

Audit and Review

Audit Initiation

The Chief Executive Officer shall:

- Initiate Audits of compliance with the H&SMS
- Appoint the Lead Health & Safety Officer or other suitable, independent person to act as Auditor
- Agree the scope and programme for the Audit with the Auditor.

Audits will normally be conducted once annually.

Audit Method

The Auditor shall conduct the Audit through:

- Reviews of documents/records
- Interviews with key personnel
- Inspections/observations at sites
- Completion of checklists.

The Auditor shall prepare Checklists in advance, based on requirements defined in the H&SMS.

Audit Report

The Auditor shall:

- Prepare a Report of the findings and submit this to the Chief Executive Officer for initial review and comment
- Revise and resubmit the Report for approval by the Chief Executive Officer.

The Audit Report shall highlight all areas of non-compliance found and shall include recommendations for corrective action and/or improvement.

Ongoing Performance Review

The Lead Health & Safety Officer shall review all H&S reports and information as received, including:

- Monthly Returns from Safety Officers

- Incident Reports
- Information from Liaison Visits and Audits
- Actions from Fire and General Risk Assessments

The Lead Health & Safety Officer shall advise the Chief Executive Officer where corrective or preventive action is needed or his support is required.

The Chief Executive Officer shall initiate improvement action, in consultation with the Safety Officers and others, as appropriate.

Management Review

The Chief Executive Officer and the Lead Health & Safety Officer shall conduct, and report in writing, a Management Review of H&S performance across Newable.

Management Review will be conducted once annually in a meeting convened each June.

The Management Review shall consider:

- (draft) Annual Report, prepared by the Lead Health & Safety Officer
- Progress against items in the current Objectives and Targets
- Continued sufficiency of the H&S Policy and the H&S Management System in general
- Organisation and resources for H&S
- Proposed new Objectives and Targets
- Other proposed changes to the H&S Management System.

Following the Management Review, the Lead Health & Safety Officer shall revise the Annual Report accordingly and submit it for information.