

# GROUP HEALTH AND SAFETY POLICY



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PART 1

GENERAL HEALTH AND SAFETY POLICY

1.1

INTRODUCTION

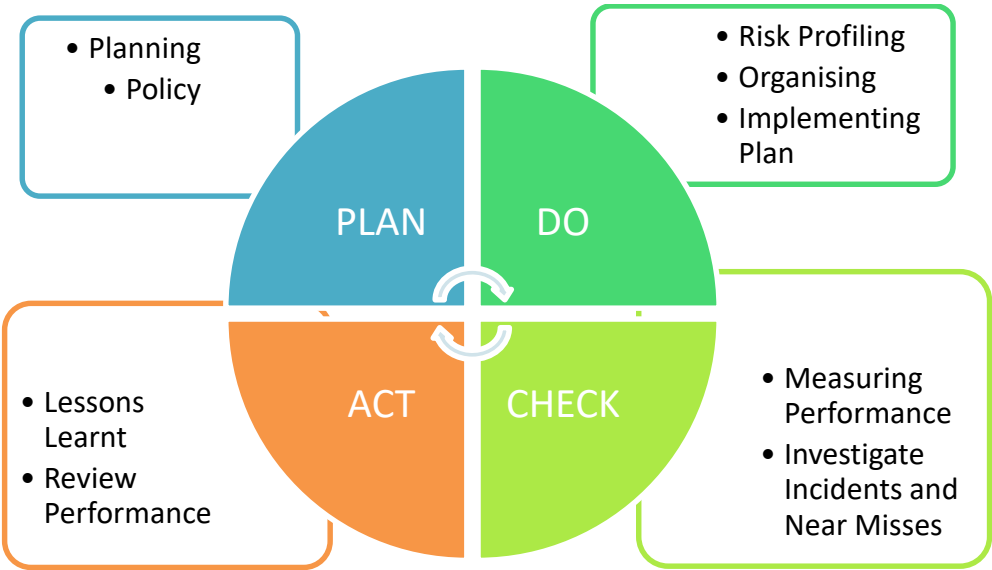
This policy is prepared in accordance with Section 2(3) of the Health and Safety at Work etc. Act 1974, with the intention of promoting a safe working environment that will, so far as is reasonably practicable, ensure the safety and health of Unite Group PLC (Unite) employees and anyone who may be affected by its business undertakings and to enable the company to comply with UK Health and Safety (Health & Safety) legislation. The group has an administrative presence in China where health and safety is enforced by the State Administration of Work Safety (SAWS). Where applicable this policy will be implemented in China as well as taking account of local requirements.

This policy sets out the aims of the company, details the structure of the organisation and how it will manage and promote its health & safety objectives, together with the arrangements for implementation to ensure legal compliance. The policy reflects what the organisation does to comply with legislation and meet good practice and recognising the hazards that it works with. The associated procedures demonstrate how this is achieved and implemented.

The policy is a formal mechanism for the adherence of the principles of the Health and Safety Management system HSG65. Unite recognises the corresponding need to create and review objectives and targets for continual improvement to meet legislative requirements and achieve best practice.

1.1.1

HSG65 Model



The 'Plan' stage determines the policy and plan, risk profiling the nature and level of risk.

The 'Do' stage is the implementation with hazard controls, communication, worker involvement, training, supervision, competent advice, managing contractors, leadership and recording findings.

The 'Check' stage measures performance by active inspections, health surveillance programmes, planned preventative maintenance (PPM), investigations into ill health, sickness absence.

The 'Act' stage is for review checking for validity and effective leadership, attitudes and behaviours, risk management and lessons learnt.

The scope of the Health and Safety Management system is to implement effective policies, hazard controls, health & safety training, equipment management, effective communication, occupational health provision, auditing and review, document control, as well as identifying where legal compliance is *required*. Controlled copies of all Health and Safety documentation are available on the safety pages of the intranet. Electronic information based systems are in place for incidents with the accident incident reporting system (AIMS), internal audit system AUDIM and External Audits and Fire risk assessments are recorded on a database system called data station.

The policy is divided into eleven parts as follows:

<b>Part 1</b>	<b>General Health and Safety Policy Statement</b>
<b>Part 2</b>	<b>Organisational Structure</b>
<b>Part 3</b>	<b>Roles and Responsibilities</b>
<b>Part 4</b>	<b>General Health and Safety Arrangements</b>
<b>Part 5</b>	<b>Health and Safety Information, Instruction and Training</b>
<b>Part 6</b>	<b>Health and Safety Communication</b>
<b>Part 7</b>	<b>Legal Requirements and Updates</b>
<b>Part 8</b>	<b>Monitoring the effectiveness of the policy and its arrangements</b>
<b>Part 9</b>	<b>Setting Objectives</b>
<b>Part 10</b>	<b>Document Control</b>
<b>Part 11</b>	<b>Legal References</b>

## 1.2 HEALTH AND SAFETY POLICY STATEMENT

The Health and Safety policy statement demonstrates how Unite will manage and implement Health and Safety:

*Unite Group PLC (Unite) undertake a range of activities from property acquisition and developments, refurbishment of existing property portfolio as well as letting, managing and maintaining student accommodation.*

*We are committed to operate in compliance with our responsibilities under the Health and Safety at Work etc. Act 1974 and all other relevant health and safety and environmental legislation, guidance and best practice and at the core of everything we do.*

*We aim to minimise risks to the health, safety and welfare of employees, customers, and members of the public, contractors and others who might be affected by our activities. The health and safety policy requires the co-operation of all employees.*

*The implementation and operation of the management system has been undertaken to establish a formal mechanism for the adherence of the principles of HSG65 and the corresponding need to create and review objectives and targets for continual improvement. We will:*

- *Provide adequate information, instruction, training and supervision to ensure that all employees are competent to undertake their role safely and with consideration to environmental and quality issues;*
- *Implement and maintain safe and healthy working conditions, equipment and systems of work;*
- *Consult employees on matters that affect their health, safety and welfare whilst at work;*
- *Undertake hazard identification, risk reduction and implementation of suitable and sufficient control measures;*
- *We will promote safe working practices to prevent accidents and work related ill health;*
- *Senior management will actively support and encourage a positive health and safety culture within Unite;*
- *Monitor the performance of both individuals and the organisation to predetermined standards, in order to make continual improvements to health and safety standards*

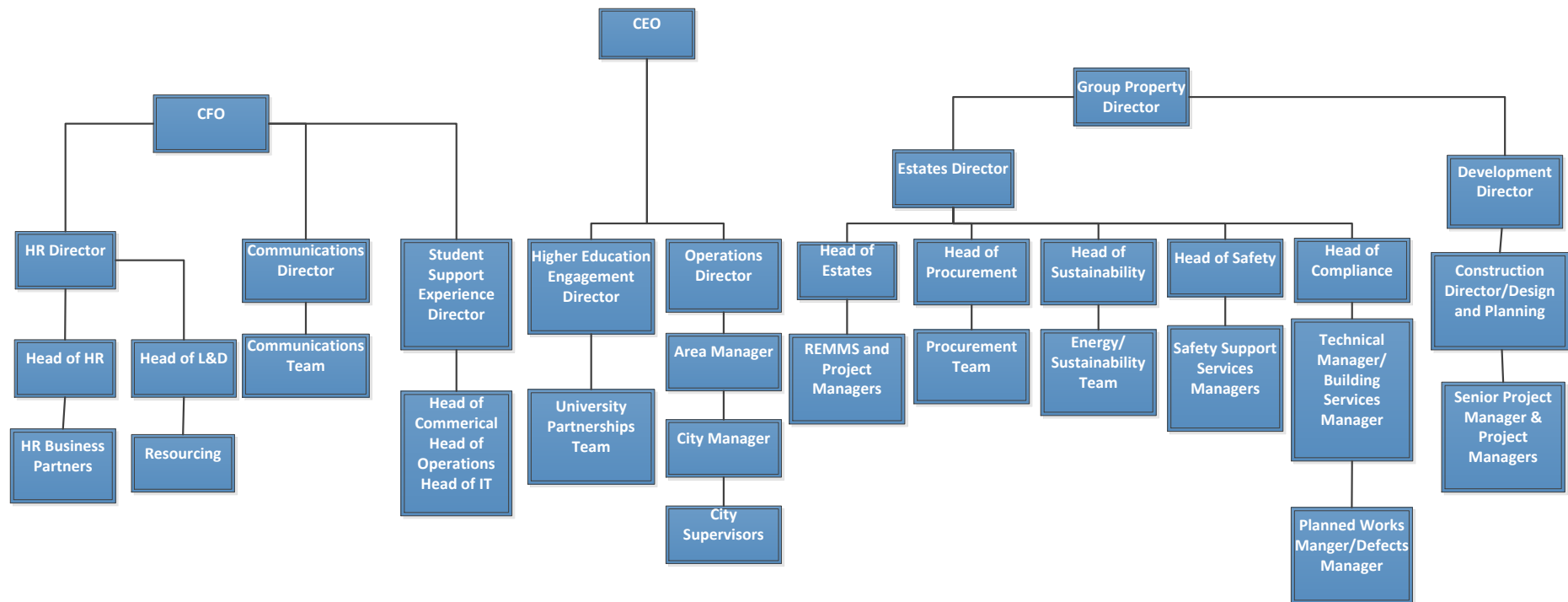
*The Health and Safety Policy, and the way in which it is operated, will be reviewed annually or when significant changes to working practices and/or legislation occur. It is communicated to all employees working under its control and other relevant interested parties.*

**Richard Smith**  
**Chief Executive**

NB: The current signed policy statement is displayed in all properties and available as a pdf on the health and safety intranet page.

## PART 2 ORGANISATIONAL STRUCTURE

The organisational diagram below identifies the levels of responsibility for health and safety.





## **PART 3 HEALTH AND SAFETY ROLES AND RESPONSIBILITIES**

### **3.1 GENERAL RESPONSIBILITIES**

#### **3.1.1 Implementation of Policy**

Although responsibility for the overall effectiveness of the health and safety policy remains with the Chief Executive; the Group Property Director and Operations Director are responsible for the day-to-day implementation of the policy. This includes risk assessments to eliminate or reduce, to the lowest practicable level, potential hazards and to satisfy themselves that any activity carried out within their area of authority, conforms to all current legislation, approved codes of practice and guidance.

#### **3.1.2 Co-operation of Employees**

Responsibility also rests with employees, to co-operate with the implementation of this policy and to assist Unite in providing, so far as is reasonably practicable, a safe and healthy work environment.

#### **3.1.3 Health and Safety Assistance**

In accordance with Regulation 7 of the Management of Health and Safety at Work Regulations 1999, a Head of Health and Safety is appointed as the competent person to provide health and safety advice. A corporate Health and Safety Team provides a strategic direction within the organisation. Advising and assisting every area of the business to implement health and safety systems, policies and procedures to ensure compliance with health and safety legislation, Approved Codes of Practice and guidance.

### **3.2 SPECIFIC ROLES AND RESPONSIBILITIES**

#### **3.2.1 The Board**

The Board of Directors of Unite Group plc is responsible for ensuring that Unite Group's health and safety management system is proportionate, implemented and reviewed annually or if there are significant changes that impact health and safety.

The Board Health and Safety Committee is assigned responsibility for reviewing and approving the Unite Group Health and Safety Policy and annual plan and ensures the governance of health & safety in both on-going operations and also construction and development activity.

The role of the Health & Safety Committee is to:

- Ensure that the Group's policies, procedures and working practices regarding health and safety meet or exceed legal obligations;
- Annually review the Group's Health & Safety Policy;
- Ensure that the Board is kept abreast of any regulatory changes in relation to health and safety and environmental issues and the impact such changes may have on the business of the Group;
- To receive reports as to Business Unit health and safety and environmental performance, policies and arrangements and any major health and safety incidents so as to ensure that management identifies and implements any corrective action considered appropriate

The property and operations boards are responsible for ensuring that the health and safety management system is implemented and that appropriate resourcing is available.

### 3.2.2 Chief Executive

The Chief Executive of Unite Group plc is responsible to the Board of Directors of the Company for the development and implementation of Unite's health and safety management system and for ensuring that the Group meets all its legal obligations in relation to health and safety.

The chief executive has ultimate responsibility for:

- Setting health and safety objectives and targets;
- Development and implementation of a robust Health and safety policy;
- Ensuring that all directors and managers have a clear understanding of their responsibilities for implementing health and safety;
- Ensuring that adequate resources are provided to enable health and safety to be implemented within the organisation; and
- Ensuring that adequate reviews are undertaken to ensure the effectiveness and implementation of the policy and; lead by example and develop a strong, positive health and safety culture

### 3.2.3 Chief Financial Officer (CFO) & Managing Director (National) of People and Comms, Group Property Director and Operations Director

The Chief Financial Officer and Managing Director have responsibility to ensure that the necessary arrangements are in place for managing health and safety effectively, and that directors (their direct reports) and senior managers' are accountable for health and safety within their areas of the business.

Specific responsibilities include ensuring:

- Participation in the development and review of the Group Health and Safety Policy, being guided by the technical expertise of the Head of Health and Safety;
- That topic specific health and safety policies and procedures which reflect the requirements of the group health and safety policy are developed and implemented;
- Suitable hazard identification is undertaken with suitable and sufficient risk assessments implemented;
- That health and safety is considered during the planning and implementation of business strategies. Informing the Head of Health and Safety of any planned changes that may have an impact on health and safety;
- Development of the annual health and safety plan;
- There is sufficient resource to successfully implement the policy and meet the objectives set out in the annual plan;
- Employees are consulted on health and safety issues and receive appropriate information, instruction and training to understand their responsibilities for their own and others health and safety;
- Health and safety is on the agenda of Board meetings and senior executive meetings;
- Arrangements are in place to monitor and review health and safety performance across the company, including accidents and incidents; and ensuring that the necessary amendments are made to relevant policies, procedures and processes within their Business Unit;
- They lead by example to develop a strong, positive health and safety culture; and
- Fulfilment of the general health and safety duties required of an employee – see below

### 3.2.4 Directors (Operations and Property)

The Directors have responsibility for the implementation of the Group Health and Safety Policy within their areas of operation. These include:

- Support the Chief Executive Officer and Head of Health and Safety in the development of the policy and annual plan. Ensuring that the objectives set out in the annual health and safety plan are met;
- Ensuring that topic specific health and safety policies and procedures which reflect the requirements of the group health and safety policy are developed and implemented; Ensure that suitable

hazard identification is undertaken with suitable and sufficient risk assessments implemented;

- Ensuring that health and safety is clearly communicated to employees with the appropriate levels of training identified and delivered;
- Health and safety is on the agenda of management and city meetings;
- Monitoring and reviewing performance measurement that ensures effective implementation and working of the Health and Safety Policy;
- Monitor and review accidents and incidents, including vehicle related, ensuring suitable investigations are undertaken to establish and share lessons learnt and prevent future incidents;
- Lead by example to develop a strong, positive health and safety culture

### 3.2.5 Corporate Health and Safety Team

The Head of Health and Safety is appointed to provide the necessary competent advice to the organisation. Their role is offer a strategic direction, develop annual plans, keep abreast of legal updates and advise accordingly, ensure the board are well informed and that suitable mechanisms are in place for the implementation of the management system.

The health and safety team comprises four regional health and safety managers and their role is to:

- Participate in the development and implementation of the Health and Safety Policy and annual plan;
- Create and review health and safety policies in line with current legislation;
- Develop a strong, positive health and safety culture throughout the company;
- Make arrangements for a formal consultation process for Health and Safety across the business;
- Investigate all serious accidents and dangerous occurrences, identifying areas for improvement;
- Review on a regular basis all health and safety activity reports and performance statistics;
- Give advice to employees on health and safety matters;
- Provide information, instruction and training as required;
- Develop and deliver health and safety campaigns;
- Audit and inspect service areas to ensure legal compliance, and improve health and safety standards across the service;

- Facilitate regional safety committees to provide a consistent delivery of safety measures

### 3.2.6 Managers

**Level 5 (Area Managers, Heads of Estates, Compliance, Procurement, Environmental, HR, Student Support Services, Health and Safety Managers, Project Managers, Quantity Surveyors); and**

**Level 4 (City, Service, Sales, Facilities, Support, Regional Estates, Compliance, Construction)**

Managers are responsible and accountable for the health and safety performance of their service area and should ensure the implementation of the Health and Safety Policy and associated topic specific policies within their areas of operation:

- Ensuring that health and safety is clearly communicated to employees, those responsibilities for health and safety are clearly allocated, and that the correct level of competence and training is identified and provided;
- Ensuring that health and safety is on the agenda for team meetings. Area Managers will attend and participate in local Health and Safety Committee meetings;
- Ensuring that clear and precise procedures and risk assessments are provided for all significant work activities and the results of these assessments are implemented and communicated to employees;
- Ensuring that all health and safety documents are easily accessible to all employees;
- Ensuring that accidents and incidents including vehicle related, have been reported, recorded, notified and investigated as appropriate, with findings evaluated and corrective actions implemented and records are maintained;
- Monitoring health and safety standards on site at regular intervals and ensure remedial action identified in site inspections and audits are implemented; and
- Ensuring that the relevant Director and Head of Health and Safety is promptly informed of any significant health and safety failure; and
- Lead by example to develop a strong, positive health and safety culture

### 3.2.7 Team Leaders

#### Level 3 (Sales, Service, Facilities, Compliance, Housekeeping Team Leaders)

- Team Leaders are responsible for understanding the safety policies and procedures and how to implement them;
- They should assist their manager to achieve a high level of health and safety performance in their service area; and should assist in the implementation of the health and safety policy and associated topic specific policies within their areas of operation;
- Attend and participate in local health and safety committee meetings as directed by managers;
- Assist in the communication of health and safety to their direct reports ensuring responsibilities for health and safety are clearly allocated, and that the correct level of competence and training has been provided. Provide the necessary resource and information on a day to day basis to enable activities to be undertaken safely;
- Ensure that there are clear and precise procedures and risk assessments available to you and our direct reports for all significant work activities;
- Ensure that you have access to all health and relevant control measures can be implemented;
- Actively participate in site inspections, audits and accident investigation activities as directed by managers;
- Assist in the implementation of local measures including emergency arrangements;
- Assist in the reporting and investigation of accidents and incidents. Reporting anything significant or of concern to managers and Health and Safety Team; and
- Demonstrate a strong, positive health and safety culture

### 3.2.8 Assistants

#### Level 2 (Sales, Service, Safety, Housekeeping, Technicians)

Level 2 Assistants have responsibility for taking all reasonable care for the health and safety of themselves, and any other persons who may be affected by their acts or omissions at work. They must also co-operate with senior managers and other employees in fulfilling our objectives and statutory duties.

### 3.2.9 Employees

General duties of an employee include:

- Employees are responsible for their own health and safety;
- Ensure their actions will not jeopardize the safety or health of others;
- Obey any safety rules, particularly regarding the use of PPE or other safety equipment;
- Learn and follow the operating procedures, risk assessments and health and safety rules and procedures for the safe performance of the assigned job;
- Comply with information, instruction or training provided;
- Correct, or report any observed unsafe practices and conditions;
- Keep work areas clean and tidy and free from obstruction;
- Make suggestions to improve any aspect of health and safety;
- Co-operate with supervisors and managers on health and safety matters;
- Take reasonable care of their own health and safety;
- Comply with emergency arrangements;
- Not to interfere with anything provided to safeguard their health and safety;
- Report accidents, incidents and hazards they observe to their Manager. Concerns can be raised at any time about an incident that happened in the past, is happening now, or may happen in the near future. (Whistle blowers are protected by the law and cannot be penalized for raising issues); and
- Report all health and safety concerns to an appropriate person

## **PART 4      GENERAL ARRANGEMENTS FOR HEALTH AND SAFETY**

### **4.1      GENERAL ARRANGEMENTS**

This section identifies the general arrangements in place for Health and Safety. For more hazardous or complex activities there are also a suite of topic specific corporate health and safety policies which detail what the organisation needs to do to comply with health and safety legislation in these areas.

The specific corporate policies owned by the Health and Safety team unless otherwise stated are:

- |   |                                       |
|---|---------------------------------------|
| • Asbestos                                      | • Emergency Preparedness and Response |
| • Construction & Design                         | • Ergonomics and Manual Handling      |
| • Driving for Work (owned by HR)                | • Fire Safety                         |
| • Electrical Safety HV/LV (owned by Compliance) | • Hot Works                           |

- Infection Control
- Lone Working
- Noise at work
- Permit to Work
- Security
- Stress Management (work-related)
- Water Hygiene
- Work Equipment (including LOLER, PUWER & Pressure Systems)
- Vibration
- Work at Height
- Vibration

Corporate procedures are available for the following topics:

- Asbestos Management procedures;
- Accident/Incident reporting procedure;
- Estates CDM procedural manual;
- Confined Spaces Management procedure;
- Contractor Management procedure;
- Key Management procedure;
- Display Screen Equipment procedure;
- Principal Contractor and Designer procedure;
- Excavations procedure;
- Emergency Response procedure;
- Lone Worker procedure;
- Permit to Work procedure and associated permit forms;
- Traffic Management Assessment procedure;
- Water Hygiene procedure and splash cards;
- Work Equipment procedures; and
- Work at Height procedures

Guidance sheets are also available on the following topics:

- Asbestos Emergency guide;
- BBQ guidance sheet;
- COSHH Storage guidance sheet;
- Safe Use of Chemicals guidance sheet;
- DSE Good Practice guide;
- Ergonomics Good Practice poster;
- Events guidance sheet;
- User Checks of Portable Electrical Appliances guidance sheet;
- Fire, Cause and Effect poster;
- Shift working guidance sheet;
- Workplace Noise - when and how to use hearing protection guidance sheet;
- Window De-Restriction guidance sheet; and
- Work at Height guidance sheets



Also, template forms are available for:

- Personal Protective Equipment (PPE) issue/return sheet;
- Infection Control guidance sheet;
- Site Inspection check sheet;
- Sharps Risk assessment check sheet;
- Risk Assessment templates – Main template, Young persons, Expectant Mothers, COSHH, Manual Handling, Lone Worker and Work-Related Stress; and
- Young persons' guidance note and template letter

## **4.2 ACCIDENT/INCIDENT/NEAR MISS REPORTING AND INVESTIGATION**

### **4.2.1 Accident/Incident Reporting**

An accident is an unplanned, uncontrolled event which has led to injury to people, damage to plant or machinery, the environment or some other loss. The reporting of accidents is not only a legal requirement, but also provides Unite with valuable information on its health and safety performance and areas for improvement. Unite shall, therefore, ensure that suitable arrangements are made for the reporting of all incidents, no matter how small and prevent under reporting.

All employees are required to report any accidents, incidents, actual fires, thefts or customer welfare incidents via the electronic reporting system 'AIMS'. A corporate procedure identifies the steps to take.

Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) requires serious accidents and certain occupational diseases to be reported to the enforcing authority. These include a fatality, specified injury, members of the public going to hospital and receiving treatment (no need to report incidents where people are taken to hospital purely as a precaution when no injury is apparent), over 7-day absence from work due to a work-related injury (away from work or unable to perform normal work duties for more than 7 consecutive days, not counting the day of the accident). This duty is fulfilled by the Health and Safety Team.

In the event of a fatality or serious incident involving severe injuries or multiple casualties refer to the corporate emergency preparedness and response policy and associated crisis management procedures.

### **4.2.2 Accident/Incident Investigations**

All incidents should be investigated, initially by the line manager or supervisor. All RIDDOR reportable incidents will also be investigated by

the Health and Safety Team who will complete AIMS determining the underlying causes/deficiencies, identify corrective and preventive actions, identifying opportunities for continual improvement and communicate results of investigations to all interested parties.

#### 4.2.3 Near Miss Reporting

A near miss is an event that did not result in injury, damage to plant, machinery, environment or some other loss, but had the potential to do so. This includes both unsafe acts and unsafe conditions. Near misses should be reported on AIMS via the Incident section. This is to ensure that investigations can be undertaken and additional controls implemented where required. This also ensures that lessons are learnt across the business and enable continuous improvement.

Corporate procedures are in place for reporting, investigating and analysing incidents.

### 4.3 ASBESTOS

The Control of Asbestos at Work Regulations 2012 (amended December 2013) applies to any work in which asbestos is encountered, whether intentionally or not, whether it is in Unite premises or other premises Unite employees may work.

Unite recognises that it has a duty to manage asbestos in its properties and will take all reasonably practicable steps to ensure that persons who live in, work at or visit Unite properties are not exposed to any asbestos risks.

The detailed corporate Asbestos policy identifies what needs to be in place in order to:

- Take reasonable steps to determine the location of asbestos within its premises (The Asbestos Survey);
- Ensure relevant employees receive regular training and have a level of knowledge and competence commensurate with their involvement in asbestos control procedures;
- Prepare and maintain an Asbestos Management Plan detailing how the asbestos risks are managed;
- Have in place mechanisms which allow The Asbestos Management Plan to be realised;
- Carry out regular reviews and monitor The Asbestos Management Plan accordingly;
- Provide relevant information on location, condition, amounts etc. for all persons who are liable to work on, or in close proximity to, asbestos;

- Presume that any material which could potentially contain asbestos, does so, unless there is evidence that it does not;
- Have in place mechanisms to deal with an emergency situation related to asbestos;
- Compile and maintain an up-to-date record of incidents / occurrences involving asbestos;
- Assess the risks of exposure posed by any incidents / occurrences involving asbestos;
- Comply with the requirements of any Client / Landlord;
- An asbestos management file will be held in all Unite owned premises;
- For Unite owned buildings a procedure to effectively identify and manage asbestos containing materials and to reduce the risk of exposure to employees, service users, visitors and contractors will be in place

#### 4.4 CONFINED SPACES

A confined space can be any space of an enclosed nature where there is a risk of death or serious injury from hazardous substances or dangerous conditions (e.g. lack of oxygen). Some confined spaces are fairly easy to identify, e.g. enclosures with extremely limited openings; storage tanks; silos; reaction vessels; enclosed drains; sewers.

Others may be less obvious, but can be equally dangerous, for example: open-topped chambers; vats; combustion chambers in furnaces etc.; ductwork; unventilated or poorly ventilated rooms.

It is not possible to provide a comprehensive list of confined spaces. Some places may become confined spaces due to the nature of the work being carried out, or during their construction, fabrication or subsequent modification. However, a list of known confined spaces within the portfolio is held by the Estates team.

Only specialist appointed contractors will undertake confined spaces entry. Unite managers will follow the confined spaces management procedure for managing the contractors and ensure that no Unite employees undertake confined space entry.

All work to be carried out in confined spaces will be done so in line with the requirements of the Confined Spaces Regulations 1997 and will include that:

- No person shall be allowed to enter a confined space unless an adequate assessment of the conditions has been made;
- Suitable control measures introduced including emergency preparedness for rescue and escape and suitable training undertaken; and

- No entry into a confined space will be undertaken without an authorised permit to work. (Refer to the corporate permit to work policy for further detailed information)

## 4.5 CONSULTATION WITH EMPLOYEES

There are two sets of general regulations about employers' duty to consult their workforce about health and safety:

- The Safety Representatives and Safety Committees Regulations 1977 (as amended) and;
- The Health and Safety (Consultation with Employees) Regulations 1996 (as amended)

Unite recognises that consulting employees or their representatives about matters to do with their health and safety is good management practice, as well as being a requirement under health and safety law. The Health and Safety (Consultation with Employees) Regulations 1996 (as amended) applies to Unite and this duty is fulfilled with local, operational and group Health and Safety committee meetings as well as an employee forum, the details of which are outlined in section six.

Consulting employees about health and safety results in:

- A healthier and safer workplace – our employees can help us to identify hazards, assess risks and develop ways to control or remove risks;
- Better decisions about health and safety – they are based on the input and experience of a range of people, including employees who have extensive knowledge about their own job and the business;
- A stronger commitment to implementing decisions or actions – as employees have been actively involved in reaching these decisions;
- Greater co-operation and trust – employers and employees who talk to each other and listen to each other, gain a better understanding of each other's views; and
- Joint problem-solving

Unite consults with employees or their representatives about the following:

- The introduction of any measure which may substantially affect their health and safety at work, e.g. the introduction of new equipment or new systems of work, such as shift-work arrangements;
- Arrangements for getting competent people to help us comply with health and safety laws (a competent person is someone who has the necessary knowledge, skills and experience to help an employer meet the requirements of health and safety law);

- The information we must give our employees on the risks and dangers arising from their work, measures to reduce or get rid of these risks and what employees should do if they are exposed to a risk;
- The planning and organisation of health and safety training; and
- The health and safety consequences of introducing new technology

Consultation involves giving information to employees as well as listening to them and taking account of what they say before making any health and safety decisions.

#### 4.6 CONTRACTOR MANAGEMENT

A contractor is regarded as any person or company who enters into an agreement (verbal or written) with Unite to carry out services. The works may be for planned preventative maintenance, emergencies, TAR, CDM or estates or compliance related improvements.

Under Section 3 of the Health and Safety at Work etc. Act 1974, Unite has a duty to ensure the health, safety and welfare of all persons, not in direct employment. This includes contractors, sub-contractors, visitors and third parties.

Unite has a robust contractor approval system, 'Safe Contractor', managed by Alcamus as well as a managed procurement process, which takes account of how the contractor and any associated sub-contractors manages health and safety.

In addition to this, the contractor is also required to complete the procurement departments Pre-Qualification Questionnaire.

Once the contractor has been appointed to undertake specific work activities there is a contractor management procedure to follow. This covers the management of contractors on site and includes the requirements for contractor corner and inductions, signing in/out, key management, contractor records manual, and permit to work requirements, supervision, monitoring and post work checks.

#### 4.7 CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH)

The Control of Substances Hazardous to Health Regulations 2002 (COSHH) requires Unite to control the exposure of their employees, and anyone else likely to be affected by our work such as customers, visitors or contractors, to hazardous substances. The COSHH Regulations prescribe the procedures required, including carrying out a risk assessment, providing and maintaining control measures, monitoring exposure levels as necessary and providing training. If the situation changes i.e. new substances or procedures are used, then assessments will be undertaken.

To prevent or control the exposure of substances hazardous to health to employees and others, the following hierarchy of measures will be adopted:

- Elimination of the use of the substance;
- Substitution of a hazardous substance to a less hazardous form;
- Segregation between persons and the hazardous substance;
- Partial enclosure, with local exhaust ventilation;
- Providing local exhaust ventilation; and
- Provision of suitable personal protective equipment

Up to date Safety Data Sheets (SDS) need to be made available and a risk assessment in place for hazardous substances taking into account the information provided on the SDS as well as the environment it will be used and stored and whether it is being mixed with other products.

Hazardous substances must be stored correctly, banded (so that 110% of the maximum volume likely to be stored at any one time) to ensure spillages do not cause contamination. Flammables should be stored in a suitable flammable store with appropriate ventilation and away from other hazardous materials. The relevant signage must be displayed on the storage area which may be an appropriate room or container. Refer to the COSHH storage safety sheet for practical guidance on storage.

Other legislation applying to substances is the EU Regulations for the Registration, Evaluation, Authorisation and restriction of Chemicals (REACH) which includes the requirement for safety data sheets and their specific content. The Classification, Labelling and Packaging of substances and mixtures (CLP) ensures that products are suitably labelled and marked. Products should not be decanted into unmarked/unsuitable containers.

A 'safe use of chemicals' guidance sheet sets out information on how to ensure products are used and stored safely.

## 4.8 CONSTRUCTION

The Construction (Design & Management) Regulations 2015 (CDM) are a control framework covering design, commissioning of work, planning and execution. They are about focusing attention on effective planning and management of construction projects, from design concept onwards. The aim is for health and safety considerations to be treated as an integral part of a project's development, not an afterthought or bolt-on extra. The object of the CDM 2015 Regulations is to reduce the risk of harm to those that have to build, use, maintain and demolish structures.

The definition of construction work:

- The construction, alteration, conversion, fitting out, commissioning, renovation, repair, upkeep, redecoration or other maintenance, de-commissioning, demolition or dismantling of a structure;
- The preparation of an intended structure, including site clearance, exploration, investigation and excavation;
- The assembly or disassembly on site of prefabricated elements to form a structure;
- The removal of a structure, or of any product or waste resulting from demolition or dismantling of a structure;
- The installation, commissioning, maintenance, repair or removal of mechanical, electrical, gas, compressed air, hydraulic, telecommunications, computer or similar services which are normally fixed within or to a structure

The specific corporate Construction and Design Policy identifies what needs to be in place and the various roles associated with CDM for the property division as well as procedures relating to principal contractor and principal designer. The requirements under CDM for work undertaken for refurbishment and maintenance within the operations unit is covered in the Estates CDM procedural manual.

#### **4.9 DISPLAY SCREEN EQUIPMENT/COMPUTER OPERATION**

Unite has duties within the Health and Safety (Display Screen Equipment) Regulations 1992 to employees who habitually use display screen equipment, including laptop computers as a significant part of their normal work.

Unite uses an internal e-learning system, to fulfil four of the main requirements of the regulations and this is managed by the Health and Safety Team.

The system ensures:

- Workstations are analysed to assess and reduce risk;
- That workstations meet specified minimum requirements;
- Work activities are planned so that they include breaks or changes of activities; and
- Provision of information and training

The provision of eyesight tests is fulfilled by provision of vouchers by HR to cover the cost of eye tests and a contribution towards glasses to DSE users.

Where a member of employees raises a matter related to health and safety in the use of DSE, Unite will:

- Take all necessary steps to investigate the circumstances;
- Take corrective measures where appropriate; and
- Advise the member of employees of action taken.

For further information, refer to the DSE procedure and good practice guide.

#### 4.10 DRIVING FOR WORK

Employees who are required to travel on company business, particularly if driving or cycling, are required to do so in accordance with the Road Traffic Act 1988 (and subsequent amendments) and comply fully with the Highway Code at all times; failure to do so may result in disciplinary action.

The Highway Code can be viewed for free online by clicking [here](#).

The specific corporate Fleet Policy, available from HR, identifies what needs to be in place in order to ensure that anyone driving in the course of their work is compliant and safe.

The main requirements are that they must:

- Have a drivers' licence and be eligible to drive in the United Kingdom;
- Have a licence that is appropriate for the type of vehicle they are driving;
- Not be under the influence of drink or drugs whilst driving for business or be expected to drive i.e. on-call;
- Have insurance that covers for business use if using their own vehicle;
- Wear a seatbelt whilst driving;
- Adhere to the speed limit both on the public highway and sites;
- Declare to their line manager if they are caught speeding or are convicted of any other traffic offence;
- Have a current MOT and ensure the vehicle is adequately maintained;
- Declare to their manager any medical condition or medication which may affect their ability to drive;
- Not use handheld phones for calls/texts/emails unless the vehicle is parked, switched off and the keys removed. Only use hands free mobile phones when it is safe to do so and consider that the use is distracting. Although it is not illegal, action can still be taken for driving without due care and attention and will be taken into account in the event of an accident; and
- All drivers of company vehicles are required to report any accidents through to Total Accident Management and a robust investigation should follow any road traffic collision (RTC)



## 4.11 ELECTRICAL

### 4.11.1 Electrical Equipment at Work

Unite recognises their responsibility and duty to ensure that all electrical equipment is properly installed, operated and maintained in a safe manner. Faulty or inappropriately protected electrical equipment can cause serious and sometimes fatal electrical shock and can also be a prime source for fire to occur. The Electricity at Work Regulations 1989 aims to prevent danger or injury from unsafe electrical equipment or work practices.

### 4.11.2 Portable Electrical Equipment

All electrical equipment in use by Unite employees is to be located so as to prevent the need for trailing cables and overloading power sockets.

Any faulty electrical equipment, damaged leads, switches or sockets, must be reported immediately to the so that remedial action can be taken. Any electrical equipment considered to be faulty should not be used and, if safe to do so, should be isolated by switching off.

Portable appliances require user checks, formal visual inspection and testing as identified below.

Anyone using a piece of hand held, portable or movable electric equipment must make a visual check of its condition prior to use. Look for signs of damage to the:

- Power lead/flex possibly leaving wires exposed;
- Plug such as bent pins or cracked casing;
- Outer sheathing of the lead not being gripped at the plug or where it enters the appliance;
- Appliance outer cover / casing such as cracks or missing pieces; and
- Over-heating such as burn marks or staining including the socket being used

Formal visual inspections are made by competent persons i.e. employees with sufficient knowledge and training. These are required more frequently than Combined Inspection and Testing. Intervals vary depending on equipment and the environment.

These involve the checks made by users, plus:

- Position of equipment to avoid damage to cables and creating trip hazards;

- Suitability of equipment in the environment it is being used and nature of work being used for;
- Means of isolation/disconnection is readily accessible to the user; and
- Condition of the equipment is checked more thoroughly than users

Combined Inspection and Test, known as Portable Appliance Testing (PAT), of all moveable electrical equipment in use at Unite is undertaken. This includes any private electrical items used by employees at Unite such as chargers etc., which may only be brought in when expressly permitted.

A guidance sheet for the safe use of portable electrical equipment is available for students and employees alike.

#### 4.11.3 Fixed Electrical Installations

A fixed electrical installation is a piece of equipment, machine, or apparatus that is permanently wired in at a site, or is an integral part of the electrical system and therefore applies to conductors, wiring and switching. Where this is the responsibility of Unite the fixed electrical installation is subjected to an inspection and test by an ECA registered electrical testing engineer accredited with CERTSURE in accordance with the recommendations of British Standard BS7671 "Requirements for electrical installations" (also known as the IEE wiring regulations).

Fixed electrical works may only be undertaken following the approval of the appointed persons in the compliance team either by a competent member of the estates team or external contractor.

Unite follow a 5 year (3 years in Scotland) testing regime using in-house qualified testing engineers to ensure both legal compliance and the integrity of fixed electrical installations in all properties. In addition, a programme of inspection, testing and repair will reduce the likelihood of electrical accidents.

The electrical safety policy owned and maintained by the Compliance team covers Electrical Safety Rules and Procedures for works on HV and LV electrical installations and includes:

- Work on or near, and the operation of electrical equipment, systems and installations for which Unite has responsibilities;
- The responsibilities for the control of the electrical systems and installations for which Unite has responsibilities;
- The appointment and competence of the Authorising Engineer, Authorised Persons, Competent Persons, Persons in Charge and Accompanying Safety persons; and

- The documentation for the application of the said rules and procedures

Where HV plant rooms are owned and managed by Unite access to HV zones is strictly prohibited unless an appointed person issues a permit to work to a competent authorised person. There is also a key access protocol procedure to follow.

#### 4.11.4 Overhead Electric Lines/Underground Cables

In the course of undertaking property development or maintenance activities there may be a need to work near overhead lines or underground cables. Suitable assessment of the risk should be undertaken and include:

- Being aware of the dangers of working near or underneath overhead power lines. Electricity can flash over from them, even though machinery or equipment may not touch them;
- Don't work under overhead lines when equipment (e.g. ladders, a crane jib, a tipper-lorry body or a scaffold pole) could come within a minimum of six metres of a power line without getting advice;
- Speak to the line owner, e.g. the electricity company, Railway Company or tram operator, before any work begins;
- Refer to and comply with the instruction in HSE Guidance note G6 Avoiding Danger from overhead lines; and
- Always assume cables will be present when digging in the street, pavement and/or near buildings

#### 4.12 EMERGENCY PREPAREDNESS AND RESPONSE

Unite shall identify the potential for emergency situations, and how to respond to such emergencies for each of the sites it occupies. The specific corporate Emergency preparedness and response management policy identifies what needs to be in place and will include:

- Identification of potential emergency situations and accidents;
- From the risk assessment, formulating and documenting emergency procedures on a site by site basis for any likely emergencies that may arise;
- Response to emergencies and mitigation of adverse health, safety, financial, environmental, and political impacts;
- Test and review of emergency preparedness and response procedures;
- Provide employees and visitors information on specific emergencies; and
- Arrangements for business continuity

The reasons for taking action are combinations of financial factors, moral factors and statutory duties. Planning for emergencies and training employees in the implementation of a plan and procedures will:

- Reduce the time taken to respond to an incident;
- Assist the organisation in meeting its legal and moral responsibilities;
- Enable rapid recovery from any incident and will assist with business continuity;
- Help mitigate any losses such as lost business, insurance premium increases, damage to property and goods, etc.;
- Reduce exposure to liability, both criminal and civil;
- Improve the public image of the organisation; and
- Reduce impact on the environment

Examples of emergencies include:

- Incident leading to serious injuries or ill health;
- Fire & explosion;
- Release of hazardous materials/gases;
- Natural disasters, bad weather;
- Loss of utility supply;
- Pandemics/epidemics;
- Civil disturbance, terrorism, sabotage, workplace violence;
- Failure of critical equipment; and
- Traffic accidents

A crisis management working group monitors and reviews the procedures and processes to ensure continuous improvement.

#### **4.13 ERGONOMICS AND MANUAL HANDLING**

The Manual Handling Operations Regulations 1992 (as amended) apply to manual handling activities at work. Manual Handling is any transporting or supporting of a load (including lifting, putting down, pushing, pulling, carrying or moving thereof) by hand or by bodily force. Unite recognises that the manual handling of loads presents a risk of physical injury.

The specific corporate Ergonomics and Manual Handling Policy identifies what needs to be in place to apply the legislation and implement the hierarchy of controls: to Avoid hazardous manual handling so far as is reasonably practicable; Assess any hazardous manual handling that cannot be avoided and Reduce the risk of injury so far as is reasonably practicable.

Where manual handling tasks are unavoidable an assessment of the risk will be carried out and recorded when necessary, using the TILE criteria (Task, Individual, Load, and Environment). The risk assessment will identify if further measures such as specifying maximum weights to suppliers and whether

mechanical aids can be used for the task and therefore reduce or eliminate the need for manual handling.

So far as is reasonably practicable Unite will:

- Organise work under our control so as to minimise the need for manual handling;
- Identify hazardous manual handling tasks;
- Ensure that risk assessments of hazardous manual handling tasks are carried out and recorded when appropriate;
- Ensure that controls identified as necessary in risk assessments are used;
- Ensure employees receive information instruction and training appropriate to their likely involvement in manual handling tasks; and
- Adopt good manual handling techniques, whether written assessments are required or not, in accordance with HSE guidance: L23, Manual Handling Operations Regulations 1992, Guidance on Regulations and the information within this policy

#### 4.14 EXCAVATIONS

Excavations may be undertaken in the course of undertaking property or estates works activities at Unite. Such works will be considered construction activities and fall under the CDM legislation refer to the appropriate construction and design policy, estates CDM procedural manual and excavations procedure.

Excavations vary in size and depth and can be dangerous. As a general rule excavations deeper than hip height must be suitably supported. The following arrangements must be in place:

- Safe access and egress;
- Suitable barriers or cover with warning signs to stop people or vehicles from falling in; and
- Spoils and plant kept a safe distance away from the edge

An excavation may be classed as a confined space and there may be other hazards associated with the operation which may require a permit to work when digging or boring.

Excavations should also be inspected at the start of each shift by a competent person who fully understands the dangers and necessary precautions. Risk assessments and method statements should be in place to ensure that appropriate control measures are implemented prior to any excavation work commencing.

A permit is not always required for routine smaller excavations that are covered by a risk assessment and method statement. Further guidance can be sourced in the specific corporate policies for: Construction and Design; Permit to Work and Electrical Equipment at Work Policy.

#### 4.15 FIRE SAFETY

Unite recognise and acknowledge their responsibilities under the Regulatory Reform (Fire Safety) Order 2005 and Fire Scotland Act (2005) to take such general fire precautions as will ensure, so far as is reasonably practicable, the safety of all members of employees and other relevant persons, residents, such as customers, visitors and contractors, in respect of the risks of fire occurring at their premises, including the provision of suitable emergency procedures.

Fire poses a significant risk to human life, property and business continuity, therefore Unite will take all reasonably practicable preventive and protective measures to eliminate or reduce the risk of a fire occurring and the risk of harm from fire to all relevant persons.

In order to ensure that suitable and sufficient arrangements are in place for fire prevention and emergency response, Unite undertake the following activities:

- Where Unite are in control of the premises, a fire risk assessment is undertaken by a competent person and effective control measures implemented to mitigate this risk;
- Site specific emergency response plans are developed and implemented which detail the procedures for implementation with information on fire evacuation plan/escape routes, fire drills, fire-fighting equipment and
- Fire safety inspections and testing of fire related equipment e.g. dry risers, sprinklers etc.;
- All employees/contractors and visitors must be made aware of the fire arrangements in place in their work locations. Where work is undertaken in premises controlled by others, they must determine the clients' fire arrangements, and comply with those arrangements;
- They must ensure that adequate co-operation and coordination is undertaken and contributes to the clients' fire risk assessments where necessary;
- Training is provided to employees on fire safety, fire investigation, and emergency procedures

Unite continue to look for additional improvements in systems and implement developments in technological solutions.

Unite work closely with fire authorities to ensure that it not only complies with legislation but meets good practice in property development, design and

ongoing management of the portfolio. There is a partnership agreement with Avon Fire and Rescue Service to act as primary fire authority, providing advice and support to the business.

The specific corporate Fire Safety Policy outlines the details of what the organisation implements and links to a number of fire guidance documents and advice sheets. Further information on emergency response can be found in the emergency preparedness and response policy.

#### 4.16 FIRST AID ARRANGEMENTS

Unite implement and maintain the first aid requirements in line with The Health and Safety (First-Aid) Regulations 1981.

Unite ensure our employees receive immediate attention if they are injured or taken ill at work. Unite include the provision of first-aid to all non-employees that may reasonably be effected by its undertaking.

Unite ensures that:

- Arrangements are made so that immediate attention is received in a situation requiring first aid and that an ambulance is call in serious cases;
- The arrangements made will manage the types of injuries or illness suffered at work and where applicable apply to others in relation to the types of work carried out;
- Accidents are reported; and
- First aid arrangements are reviewed regularly

The level required has been ascertained using a first aid 'needs analysis' which is held with the Health and Safety Team.

In general terms a needs assessment identifies that with less than 25 employees an appointed person is required, with 25-50 there should be employees trained to the Emergency First Aid at Work level and with more than 50 employees First Aid at Work training.

The appointed person takes charge of the first-aid arrangements including looking after equipment and facilities, call emergency services. They take charge but not administer first aid.

This ensures that the following can be arranged:

- The first aid requirements;
- The materials required to administer first aid;
- Selection and training;
- Information on first aid arrangements;
- Reporting accidents and maintaining records; and

- Reviewing the arrangements

Any accidents, however minor, or ill health occurring must be notified on AIMS.

In its application of the first aid regulations for its employees Unite does not provide trained first aiders for the customers. The appointed person ensures that measures are in place to obtain assistance from the emergency services.

## 4.17 GAS SAFETY

If gas appliances, such as ovens, cookers and boilers are not properly installed and maintained there is a danger of fire, explosion, gas leaks and carbon monoxide (CO) poisoning. The Gas Safety (Installation and Use) Regulations 1998, requires all gas appliances to be inspected and serviced, annually, by a person who is registered on the "Gas Safe Register".

Unite understands the importance of ensuring the maintenance and statutory testing of gas appliances. The gas servicing is currently delivered by a third party specialist. Currently, their service is broken down into a major and a minor on each appliance per year. All gas works are in accordance with gas safe, IGE/UP/1&2 and is the statutory landlord's gas safety certificate.

### 4.17.1 The Major Service

Prior to works being carried out, they test the gas supply and take combustion readings, open the boiler heat exchanger and sweep out, vacuum check for defects and record. Then reassemble, test, take combustion readings and retest the gas supply, test the gas supply within the plantrooms, but not the entire gas installation from the meters if it is a large installation. Trim gas and air if combustion readings are out of line; check the operation of pumps, controls, gauges and the like.

Mechanisms are in place within the compliance team for the effective reporting of any defects accordingly for immediate and essential action.

### 4.17.2 The Minor Service

The minor service includes checking combustion, trim if required, check components for safe operation, visual leaks and defects. And readings are recorded.

As well as the relevant gas legislation the Pressure Systems Safety Regulations 2000 also apply. Unite appoints an external contractor to ensure that a suitable written scheme of examination is in place before



the system is operated. They also examine the system in accordance with the written scheme of examination.

Unite also recognises the risk in relation to carbon monoxide and the external contractor will also provide a bi annual inspection to such systems as part of this contract.

#### **4.18 HAZARD CONTROL - RISK ASSESSMENT AND METHOD STATEMENTS**

The management of Health and Safety at Work Regulations 1999 requires Unite to make suitable and sufficient assessment of the risks to the health and safety of their employees to which they are exposed whilst they are at work; and the risks to the health and safety of persons not in their employment arising out of or in connection with the conduct by their undertaking.

The management and control of risk is a key element of the health and safety management system. There is a requirement to ensure a consistent level of risk control across the business hence a risk assessment template is used to ensure continuity. The methodology for hazard identification and risk assessment relates to the scope, nature and size of the organisation.

Hazard identification and risk assessment takes account of:

- Hazards (something with the potential to cause harm including sources, situations or acts which may be physical, chemical, biological or psychosocial);
- The risks (the likelihood of it happening);
- Who may be harmed;
- Control measures needed to mitigate the risk; and
- Regular reviews

Regular management reviews will identify whether the methodology needs to be changed. A simple qualitative risk assessment is used which requires a degree of judgement and there should be consultation with the employees, where possible.

The organisation has established, implemented and maintains a corporate Risk Assessment procedure for the ongoing hazard identification, risk assessment, and determination of necessary controls. The procedures for hazard identification and risk assessment takes into account: routine and non-routine activities; activities of all persons having access to the workplace (including contractors and visitors); human behaviour, capabilities and other human factors; identified hazards originating outside the workplace capable of adversely affecting the health and safety of persons under the control of the organisation within the workplace; hazards created in the vicinity of the workplace by work-related activities under the control of the organisation; infrastructure, equipment and materials at the workplace, whether provided by the organisation or others; any applicable legal obligations relating to risk

assessment and implementation of necessary controls; the design of work areas, processes, installations, machinery/equipment, operating procedures and work organisation, including their adaptation to human capabilities. Regular annual reviews of risk assessments are undertaken and/or when there are any significant changes.

Corporate Risk Assessment templates are available for Young Persons, Expectant Mothers, Lone Working, Manual Handling and Work-Related Stress. The Health and Safety Team are able to assist with specialist assessments.

Also cities/departments undertake activity based risk assessments for their areas of work and ensure operational controls are implemented to manage health and safety risks to an acceptable level for operational areas and activities. In determining the appropriate control measures the hierarchy of control has to be applied which is to:

- Eliminate the risk and where this is not possible;
- Mitigate the risk by substituting hazardous materials or reducing system energy;
- Ensuring engineering controls are in place;
- Providing signage/warnings;
- Implementing administration controls including method statements and supervision; and
- Personal protective equipment

All the control measures identified through this process would need to be in place to ensure the level of risk was brought down to as low as reasonably practicable (ALARP).

Method statements for each main activity are undertaken by cities/departments and implemented ensuring a description of a step by step approach on how a job is to be carried out in a safe manner and without risks to health. It includes all the risks identified in the risk assessment and the measures needed to control those risks.

General control measures shall include: Maintenance and repair of facilities, machinery and equipment to prevent unsafe conditions from developing; Housekeeping and maintenance of clear walkways; Traffic management; Provision and maintenance of workstations; Maintenance of the thermal environment; Maintenance of the ventilation systems and electrical safety systems; Maintenance of emergency plans; Health programmes (medical surveillance programmes); Training and awareness programmes relating to the use of particular controls (e.g. permit to work systems).

It is the responsibility of Managers to ensure that risk assessments are in place for all potentially hazardous activities and where this is a foreseeable risk,

ensuring that effective control measures have been implemented. The assessments should be available to all who undertake the activities.

Refer to contractor management for information on risk assessments and method statements provided by contractors for their undertakings.

#### 4.19 HOUSEKEEPING

Unite has a responsibility to ensure, so far as is reasonably practicable, a safe place of work and safe systems of work for all our employees. This cannot be achieved without good standards of housekeeping. In particular, the workplace must be kept clean and tidy to avoid the creation of hazards.

The Workplace (Health, Safety and Welfare) Regulations 1992 requires that waste materials must not be allowed to accumulate, except in suitable receptacles; workplaces and inherent furniture, furnishing and fittings must be kept sufficiently clean; floor, wall and ceiling surfaces of internal workplaces must be capable of being cleaned. The regulations also require workplace floors and traffic route surfaces, as far as is reasonably practicable, to be kept free from obstructions, articles or substances likely to cause slips, trips or falls.

Poor standards of housekeeping can be a cause of slips and trips resulting in injury and damage and can create unnecessary fire hazards. Low standards often result from poor working practices and/or organisational deficiencies within the workplace.

Workplace inspections and audits are carried out on a regular basis by Managers, City Managers and the Health and Safety Team to identify areas where housekeeping standards require improvement and any areas requiring remedial action.

To ensure that satisfactory standards of housekeeping are achieved and maintained, all employees should:

- Check, at the beginning of each working day, that their work area is clean and tidy;
- Always put items away after use;
- Clean up immediately any spillages, especially those that could create a slipping hazard;
- Maintain any walkways around their work area so that they are free from obstructions such as boxes or discarded equipment;
- Ensure that waste materials are properly disposed of;
- Not store items in any other location but the designated area; and
- Ensure the work area is left tidy and any items of equipment or work substances used have been put away at the end of the working period

## 4.20 HOT WORKS

For the purposes of this policy, hot works is defined as any activity or process that generates flames, heat or an incentive spark and introduces or presents a foreseeable risk of fire or explosion through a source of ignition by means of tools or equipment either:

- Intentionally arising from work methods with, or without, the use of a naked flames, such as welding, soldering, flame cutting, brazing etc.; or
- The unintentional generation of heat or sparks caused by the use of power tools such as grinding and the use of disc cutters; or
- The unintentional generation of incensive sparks such as caused by static electricity

Unite may carry out hot works as part of its work activities. A suitable task specific risk assessment and method statement should identify hazards and ensure that suitable control measures are identified. It is the managers and person undertaking the hot works to implement the control measures. Refer to the permit to work policy for guidance as to when certain hot works requires a permit.

## 4.21 INFECTION CONTROL

Infections at work are created by exposure to harmful micro-organisms such as bacteria, fungi, viruses and parasites. Employees or customers may be harmed by being infected with toxins from the micro-organism or by having an allergic reaction to the micro-organism.

The route of infection is not always identifiable therefore precautions to prevent the spread of infection must be implemented.

The specific corporate Infection Control Policy identifies what needs to be in place in order to ensure that:

- A suitable and sufficient risk assessment will identify the activities and employees that are at risk from infection whilst at work and risk control measures will be implemented to either prevent or reduce the risk as far as reasonable practicable;
- Arrangements are made to minimise the spread of infection in the case of an outbreak;
- An analysis of employees' roles will be undertaken and those employees who are considered "at risk" from infections will be given inoculations;
- Employees will be suitably informed and trained to prevent infection and deal with infection in the event of an incident;
- Appropriate facilities and equipment are available to prevent and deal with contamination;
- Occupational health advice and treatment is provided;

- Ill health will be reported and records held for the appropriate duration; and
- Review practices and share best practice both internally and externally, and keep up to date with changes in legislation to continually improve infection control

Information on sharps management is covered later in this policy document along with further details in the infection control policy and associated procedures.

## **4.22 LONE WORKING/SHIFT WORKING**

### **4.22.1 Lone Working**

Lone workers are technically those who work by themselves without close or direct supervision. However, within the cities employees are often working by themselves, although there is a presence of customers. In these circumstances Unite deems them to be lone working and suitable control measures will be implemented. This includes an independently monitored alarm system provided to individuals so that they can activate if they feel their safety is at risk. There are associated procedures and training for these devices.

The specific corporate lone working policy identifies what needs to be in place and where work activities require employees to work alone managers should ensure the risks to these employees are assessed and adequate control measures in place including communication, monitoring, emergencies and incident reporting. Unite will undertake a lone worker risk assessment if identified as necessary which considers the likelihood of injury and the possible consequences.

Employees should always report any concerns to their manager or the Health and Safety Team.

### **4.22.2 Shift Working**

Shift work, particularly nights and early morning shifts, can have undesirable consequences for workers including disruption of the internal body clock, sleeping difficulties and fatigue. These in turn can affect performance, increase the likelihood of errors and accidents at work and might affect health and wellbeing.

As part of the occupational health requirements Unite undertake information sessions and questionnaires to identify issues and assist with health and wellbeing for shift workers and night workers via our occupational health partners.

#### **4.23 NOISE AT WORK**

Unite will assess all processes and operations carried out so as to ensure that the requirements of the Control of Noise at Work Regulation 2005 are complied with. The specific corporate Noise Policy identifies what needs to be in place in order to assess noise levels and where the noise levels exceed the actions levels specified in the regulations, appropriate arrangements will be put in place to ensure that no employee or others affected by the work activity are subjected to conditions which could cause harm.

Hearing protection will be made available on the site/workplace for any operations where it is not practicable to reduce the noise levels to a safe limit – in line with the action levels specified in the Noise at work regulations. A 'when and how to use hearing protection guidance sheet' provides useful information for when protection is required and how to wear it.

Hearing Protection will be made available to all employees working in areas where the average noise levels of 80dB (first action level). Hearing protection will be mandatory when the average noise levels exceed 85dB (second action level). Areas with high noise levels will be clearly identified as hearing protection zones with mandatory hearing protection warning signs displayed. This specifically relates to noise created by work activities and not nuisance noise created by customers.

#### **4.24 OCCUPATIONAL HEALTH AND HEALTH MANAGEMENT**

Unite identifies that good health is good business and aims to prevent and control risks to health at work, promoting good health, reducing the impact of ill-health in the workplace and provide support for those with conditions made worse by work and facilitating a return to work following illness or disability.

Health Surveillance programmes are in place for proactive monitoring and reactive assessment. Unite has appointed an external occupational health provider to fulfil this role and referrals are made via HR or the Safety Support Service team.

#### **4.25 PERMITS TO WORK**

A permit to work system aims to ensure that proper consideration is given to the risks of a particularly hazardous job or simultaneous activities at one site. It is an additional management control system which authorises certain competent people to carry out specific tasks at a certain time, and sets out the precautions needed to complete the job safely.

The specific corporate Permit to Work Policy identifies what needs to be in place in order to manage particularly hazardous activities and the permit to

work procedure and permits identify how the system is undertaken and implemented.

A permit to work is a formal recorded process used to control work which is identified as potentially hazardous. They must only be issued by trained appointed persons. A permit includes a description of task, location, work to be done, tools to be used, potential hazards, precautions, personal protective equipment, approver and time of issue.

Permits to work are used for:

- Hot works, work where heat is generated, work which generates sparks or other sources of ignition;
- Working on or near fragile roofs, or other work at height activities that poses extra hazards of a non-routine nature, for example, over water;
- Confined space entry, work in tanks, excavation, to ensure suitable escape and rescue systems;
- Live electrical work, or work on high voltage equipment that gives rise to danger;
- Work on asbestos containing materials;
- Any other potentially high risk operation

Where a hazardous activity, or work in a hazardous area is to be undertaken by contractors they must not be permitted to work unless they are in possession of a Unite Permit to Work signed by a competent/ Appointed Person.

#### **4.26 PERSONAL PROTECTIVE EQUIPMENT (PPE) AND CLOTHING**

The Personal Protective Equipment at Work Regulations 1992 (As amended 2002) applies to equipment that will protect the user against health and safety risks at work.

In respect of these obligations and commitments, Unite will:

- Ensure that PPE is the last form of control measure once all other measures are in place;
- Provide PPE where necessary as part of a safe system of work and ensure so far as is reasonably practicable, that it is used;
- Provide information, instruction, training and supervision in the use and care of such PPE;
- Consult employees or their representatives on the choice, use and care of PPE

Any member of employees not complying with a requirement to use PPE will be subject to disciplinary procedures. A template form is available for a manager/supervisor to use for issue/return of PPE.



Uniforms are not classed as PPE however provide a professional corporate identity and as such should be well maintained and laundered.

#### 4.27 SAFEGUARDING

Unite ensures that it maintains the highest possible standards to meet its social, moral and legal responsibility to protect the welfare of vulnerable adults and/or children.

Unite recognises the definition of vulnerable adults as those over 18 'who are or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation' (Department of Health, 2000).

Vulnerability can apply to a wide range of disabilities and situations, and may be temporary or permanent. Individuals can become vulnerable when no previous conditions existed, for example if they become ill.

A vulnerable adult may be a person who, for example:

- Has learning disabilities;
- Has mental illness; and
- Has physical disability

Children are defined as those aged under 18 years. Unite Students no longer provides accommodation for under 16s (bar existing customers until their current agreement expires).

All reasonable steps are taken to promote and safeguard the welfare of residents who are vulnerable adults and/or children, and relevant legislation and government guidance is complied with.

The Student Services team establishes the protocols and procedures for managing and supporting situations involving vulnerable adults and/or children. The head of HE Engagement and Student Services takes the lead accountability for child protection and safeguarding issues. Student Services Managers act as designated Safeguarding Officers and are available to provide advice and support to other staff on issues relating to Safeguarding as well as make referrals to external support agencies. Additionally, there are welfare leads within the properties who will act as points of contact, escalating and managing cases as required.

Safeguarding officers and welfare leads will receive the appropriate training and refreshers to allow them to fulfil their roles which will be aligned with the training for Tier 3. Regular peer group meetings ensure support and shared knowledge. All employees interfacing with our customers are made aware of



issues relating to safeguarding and how this can apply to individuals irrespective to their age.

Safe recruitment practices are applied when checking the suitability of prospective staff to work for Unite and DBS checks are undertaken as required. Given the nature of Unite's business the regulations do not currently require enhanced checks to be undertaken.

## 4.28 SECURITY

Unite has established a specific corporate security policy which defines protocols and minimum standards in relation to our properties and employees thereby providing customers and employees with the reassurance of safety and security.

External security specialists have been consulted to assess levels of security in relation to procedural, management and technology so as to identify areas for continuous improvement. The corporate emergency preparedness and response policy also covers areas related to security and includes the 'Prevent' strategies and training.

## 4.29 SHARPS/NEEDLESTICKS

Unite recognises that employees may come across sharps/needles as part of their routine activities. Unite ensures that suitable measures are in place to control the risk to employees.

Sharps contaminated with infected blood can transmit more than 20 diseases, including hepatitis B, C and human immunodeficiency virus (HIV). Because of this transmission risk, sharps injuries can cause worry and stress to those who receive them.

A sharps injury is an incident, which causes a blade such as a razor, scalpel or other medical instruments to penetrate the skin. A needle stick injury is specifically when a needle (syringe, cannula, blood testing device), punctures the skin.

Where a work activity has the potential to encounter sharps then a risk assessment should be undertaken and take account of the potential exposure to sharps and where the exposure cannot be controlled then the risk of injury must be adequately controlled.

The following hierarchy of control must be considered:

- The design and use of appropriate work processes, system and the provision and use of suitable work equipment and materials;
- The control of exposure at source, e.g. having a waste procedure which ensures safe collection, storage, transport and final disposal of waste; and

- Where adequate control of exposure cannot be achieved by other means, provision of suitable personal protective equipment (PPE) in addition to the measures required by the above

The corporate infection control policy provides details of the measures to be implemented, equipment, facilities and training required, dealing with sharps incidents as well as a checklist for a sharps risk assessment.

#### 4.30 STRESS MANAGEMENT

Unite are committed to providing a safe and healthy working environment for their employees and recognises the importance of fostering psychological as well as physical well-being. Specifically Unite is committed to the promotion of health, to the prevention of workplace pressure causing stress, and to the provision of support to any member of employees who may suffer stress.

This commitment arises from Unite's duty of care to all employees, and more generally the recognition that a safe and healthy working environment contributes to the motivation, job satisfaction, performance, and creativity of all employees.

There is no specific law on controlling stress at work but broad health and safety law applies. This means that employers have a legal duty to take reasonable care to ensure that health is not put at risk through excessive and sustained levels of stress arising from the way work is organised, or from the day-to-day demands placed on their workforce, and that all employees have an individual responsibility to minimise the risk of any kind of harm to themselves and their colleagues and to co-operate with management in its efforts to manage work-related stress.

Refer to the specific corporate Work-Related Stress policy which identifies how Unite proactively identifies and manages stressors as well as the process for managers and employees in stress related cases.

#### 4.31 VIBRATION

The Control of Vibration at Work Regulations 2005 applies to any work in which exposure to vibration whether to hands and arms (HAV) or whole body (WBV). The specific corporate Vibration at Work policy identifies what needs to be in place in order to protect employees where they are likely to be exposed to vibration at or above the relevant exposure action or limit values.

Where there is a risk of exposure assessments are undertaken and implemented to eliminate, minimize or provide additional controls the risk. Where necessary, health surveillance programs are in place.

## 4.32 VIOLENCE AND AGRESSION

People who deal directly with customers and the public may face aggressive or violent behaviour. They may be sworn at, threatened or even attacked. Unite will endeavour to reduce the likelihood of employees being exposed to violence and aggression and where this is not feasible then provide the skills, knowledge and training to deal appropriately with the situation.

The specific corporate Security policy identifies what needs to be done to reduce the risk of violence and aggression towards employees. A four stage management process can be adopted by managers when undertaking a risk assessment and will include identifying if and where there is a problem, deciding what action to take, taking action and then checking what has been done.

Any incident relating to violence and aggression should be reported and recorded on the incident reporting system, AIMS.

Training is provided in two ways, for customer facing employees they receive guidance on challenging situations. Service and Safety employees are provided with conflict management training by a third party.

## 4.33 WATER HYGIENE

Unite will adopt as far as reasonably practicable the principles of control and management identified in the current edition of the HSE (Health and Safety Executive) Approved Code of Practice ACOP L8 "The Control of Legionella Bacteria in Water Systems".

The specific corporate water hygiene policy identifies what needs to be in place in order to comply with the legal duties and Unite will:

- Identify and assess sources of risk - this includes checking whether conditions are present which will encourage bacteria to multiply, e.g. is the water temperature between 20-45°C; there is a means of creating and disseminating breathable droplets, e.g. the aerosol created by a showers or spray taps, if there are susceptible people who may be exposed to the contaminated aerosols;
- Assess the risk of scalding to service users and take precautions as necessary;
- Prepare a scheme for preventing or controlling the risk;
- Implement, manage and monitor precautions - if control measures are to remain effective, then regular monitoring of the systems and the control measures is essential. Monitoring of general bacterial numbers can indicate whether microbiological control is being achieved. Sampling for legionella is another means of checking that a system is under control;
- Keep records of the precautions;

- Appoint a person to be managerially responsible and identify responsibilities and competence of employees and contractors.

#### 4.33.1 Legionella

Legionella bacteria can survive under a wide variety of environmental conditions and have been found in water at temperatures between 6°C and 60°C. Water temperatures in the range 20°C to 45°C seem to favour growth.

While previously healthy people may develop Legionnaires' disease, there are a number of factors that increase susceptibility:

- Increasing age, particularly above 50 years;
- Sex: males are three times more likely to be infected than females (this may change with altered smoking habits);
- Existing respiratory disease that makes the lungs more vulnerable to infection;
- Illnesses and conditions such as cancer, diabetes, kidney disease or alcoholism, which weaken the natural defences;
- Smoking, particularly heavy cigarette smoking, because of the probability of impaired lung function; and
- Patients on immunosuppressant drugs that inhibit the body's natural defences against infection

Legionnaires' disease is a potentially fatal form of pneumonia which can affect anybody, but which principally affects those who are susceptible because of age, illness, immunosuppressant, smoking etc. It is caused by the bacterium *Legionella pneumophila* and related bacteria. Legionella bacteria can also cause less serious illnesses which are not fatal or permanently debilitating.

The compliance department manage and implement the maintenance and controls for water hygiene including a task matrix and external water treatment specialists. Refer to the corporate specific water hygiene policy and associated procedures, splash cards and task matrix for further information.

#### 4.34 WELFARE FACILITIES

Unite acknowledges their responsibilities within the Workplace (Health, Safety and Welfare) Regulations 1992 in respect of the working environment including issues of good housekeeping and the provision and maintenance of adequate welfare facilities for employees.

This includes aspects of the workplace that can affect employee's health and safety, including temperature, ventilation, lighting and workspace as well

as defining standards for accommodation for clothing, facilities for changing, rest and eating areas, and washing and sanitary facilities.

#### **4.34.1 Workspace**

Unite endeavours to provide workspace and a working environment for employees that satisfy the requirements of the Workplace (Health, Safety & Welfare) Regulations and allows for sufficient unoccupied space to facilitate unimpeded access and egress, especially emergency escape.

#### **4.34.2 Temperature**

Unite endeavours to maintain temperatures within the workplace that are reasonable for all employees. Though no upper temperature limit is currently specified within legislation, indoor working temperatures should be "reasonable for the comfort of persons employed", and should not be less than 16°C for office work and 13°C if the work involves extreme physical effort.

#### **4.34.3 Ventilation/No Smoking Policy**

Regulation 6 requires that effective and suitable measures are taken to ensure that enclosed workplaces are adequately ventilated and "stale air or air that is hot or humid" is replaced at a reasonable rate. "Ventilation" includes both openable windows and mechanical systems, and the legal requirements include avoidance of unpleasant smells and exhaust fumes, where possible. The main method of ventilation within the premises is by openable windows and extractor fans for internal spaces without windows (toilets).

Unite premises are designated as no smoking and employees/customers/visitors are not to smoke on the premises, except in designated smoking shelters during breaks. This is also required by the Health Act 2006 and Smoke-free (Premises and Enforcement) Regulations 2006.

Employees are also required not to smoke e-cigarettes in customer facing areas, in offices or near other employees. This is due to the information/evidence currently available not being conclusive as to whether there are any adverse effects to passive smoking.

#### **4.34.4 Sanitary and Washing Facilities**

Unite provides, in accordance with our legal responsibilities, suitable and adequately maintained sanitary and washing facilities within our premises for use by employees, visitors and contractors. All sanitary and washing facilities are regularly cleaned and maintained and have

adequate soap and hand drying facilities. All employees have a responsibility to use the facilities correctly and to assist in the maintenance of good standards of cleanliness by being tidy and leaving the facilities in a suitable condition after usage. Any inadequacies with the facilities noted by employees should be reported.

#### **4.34.5 Lighting**

The general need is for adequate lighting, preferably by natural light sources, for the nature of the work being undertaken.

#### **4.34.6 Student Welfare**

This policy does not cover the physical and psychological welfare issues of Unite customers (students living with Unite). However, there are mechanisms in place to help and support their wellbeing which is covered by the student support services team.

#### **4.34.7 Window, Balcony and Roof Terrace Safety**

Unite recognises the need to manage the risk of falls from height within its properties and where possible designs out the risk in new builds and refurbishments.

Within the student accommodation sector there are three broad categories of falls from windows/balconies and roof terraces to consider:

- Accidental falls;
- Falls arising out of a confused mental state; and
- Deliberate self-harm

In respect of its responsibilities Unite will take all reasonably practicable measures to prevent falls from properties by ensuring the following:

##### **Windows**

Regulation 15 applies to risks associated with windows, skylights and ventilators. Where there is a risk of falling from height, devices that prevent the window opening too far are fitted (e.g. window restrictors). The bottom edge of openable windows should be at least 800 mm above floor level, unless there is a barrier to prevent falls.

##### **Balconies/Roof Terraces**

Where assessment identifies that service users are at risk of falling, then sufficient protection should be provided to prevent them from accessing balconies/roof terraces or climbing over the balcony edge

protection. This should take into account furniture or features with footholds which may allow access over the barrier (chairs, tables, plant pots, walls etc.).

### **Risk Assessment**

To adequately manage the risk of falls from windows or balconies, Unite will assess the premises and risk to service users. This includes assessing the risk that furniture, or other items, may enable them to climb over barriers, or access windows which might otherwise be inaccessible. Suitable controls may include: fitting adequate window restrictors to bedrooms, studios, kitchens and communal areas; ensuring balconies have edge protection that is sufficiently robust, and of suitable design (including height, and the size of any openings in it), to prevent accidental falls; fitting an adequate screen or barrier to prevent service user access to a window or balcony edge.

### **Inspections**

Periodic visual and in-room inspection programmes are completed and documented with appropriate safety signage displayed. Monthly visual inspections will be completed by Service and Safety team as part of the "Safer Building" audit. Visual inspections will aim to identify windows where the restrictor has been tampered with, permitting full opening.

### **De-Restriction**

A strict de-restriction assessment procedure is undertaken should a need arise, with strict control measures which must be fully implemented. Refer to the de-restriction guidance sheet for full details. A property considering or a customer requesting de-restriction of a window must result in the completion of the relevant Risk Assessment to confirm all stated controls are in place. If all controls cannot be achieved de-restriction must be refused.

### **Maintenance**

Routine planned preventative maintenance ensures that all safety fixtures and fittings are functioning effectively and their performance has not deteriorated as a result of use, wear or tampering.

### **Doors and Gates**

Doors and gates should be constructed and maintained in accordance with Building Regulations 1 and 2 and maintained as required by regulation 5. The compliance team manage the planned preventative maintenance programme throughout the portfolio.

Power-operated doors and gates should have safety features to prevent people being injured as a result of being struck or trapped. Safety features include:

- A sensitive edge, or other suitable detector, and associated trip device to stop, or reverse, the motion of the door or gate when obstructed;
- A device to limit the closing force so that it is not enough to cause injury;
- An operating control which must be held in position during the whole of the closing motion. This will only be suitable where the risk of injury is low and the speed of closure is slow. Such a control, when released, should cause the door to stop or reopen immediately and should be positioned so that the operator has a clear view of the door throughout its movement

They should be designed, assessed and tested in accordance with the current standards which are relevant to powered gates, including:

- BS EN 13241-1 the Product Standard for powered doors and gates
- BS EN 12604 & BS EN 12605 on mechanical requirements and tests
- BS EN 12453 & BS EN 12445 on requirements and test for powered gates
- BS EN 12635 on installation and use
- BS EN 12978 on safety devices for power operated doors and gates

Before first use they must meet the requirements of the Supply of Machinery (Safety) Regulations 2008.

#### **4.35 WOMEN OF CHILD BEARING AGE/NEW AND EXPECTANT MOTHERS**

Unite recognises that some physical, biological and chemical agents, processes and working conditions can affect the health or safety of women of child bearing age and particularly new or expectant mothers or their unborn child. Generally, the majority of work activities and environment at Unite should not present any undue risk to women of child bearing age or expectant mothers and their unborn child or new mothers.

Unite is aware of the susceptibility of women to certain hazards/risks that may arise as a consequence of their employment and will assess and document those additional risks, and ensure measures are provided to protect the health and safety of any women employed, so far as is reasonably practicable.

Unite is aware of the statutory requirements imposed on, and relating to, work undertaken by women and will comply with these requirements. Female employees will be given all the information, instruction and training necessary to enable them to work safely and without risks to their health.



Employees have a responsibility to notify their manager of their pregnancy. Unite will then take all reasonable steps to safeguard the health, safety and welfare of the expectant mother, and of their unborn child and undertakes to assess all risks to expectant or new mothers arising from their work activities and to take appropriate preventative or control measures.

It is the responsibility of the line manager to undertake a risk assessment and regularly review it with the individual to take account of changing circumstances. A corporate generic expectant mothers' risk assessment can be used as a basis for the assessment however individual circumstances must be considered and controlled.

Unite undertakes to regularly monitor the work undertaken by expectant or new mothers, especially during the development of pregnancy, in order to continually assess the individual's ability to work safely and without risk. All problems identified will be addressed, so far as is reasonably practicable, and all risks will be adequately controlled and safe systems of work established.

If the new mother returns to work within 6 months of giving birth or while breastfeeding a further risk assessment will be carried out.

As part of the assessment process for expectant or new mothers working at Unite, working procedures are to be applied as follows:

- Exposure to physical agents such as vibration, noise, temperature extremes, poor or prolonged working postures and repetitive movements are to be avoided or at least minimised; and
- Manual handling activities will be assessed and the individual's ability to carry out these activities regularly monitored, this is particularly important as these abilities will alter as the pregnancy develops

#### **4.36 WORK EQUIPMENT**

Unite recognises that all work equipment provided for use at work must be suitable and sufficient for the purpose for which they will be used, are maintained in good condition and inspected and tested as per statutory requirements. And that persons' using the equipment are suitably informed, instructed and trained.

The specific corporate Work Equipment Policy identifies what needs to be in place and reflects the legal requirements of the Provision and Use of Work Equipment (PUWER) 1998, Lifting Operations and Lifting Equipment Regulations (LOLER) 1998 and Pressure Systems Safety Regulations 2000.

With the exception of small hand tools (non-powered) employees should not use their own equipment except in exceptional circumstances and this must

be agreed in writing by head of department for Health and Safety with evidence that it is suitable and fit for purpose with appropriate certification and maintenance records.

The Compliance team are responsible for the following planned preventative maintenance (PPM) activities:

- Periodic electrical testing;
- Emergency lighting tests;
- Fire alarm testing;
- AOV testing; and
- Air Handling inspections

External contractors are appointed to maintain and undertake the relevant statutory testing for gas appliances, lifting equipment including lifts, fire extinguishers, water hygiene, pressure vessels, roof mounted man-safe systems, gates and barriers, lightening protection and sprinkler systems.

#### **4.36.1 Regulatory Requirements for work equipment**

In respect of the legislative requirement Unite will ensure that:

- Work equipment must be suitable and properly maintained. Any work on equipment and any maintenance work must only be carried out by designated persons. Those persons must have been given adequate training and deemed competent. Maintenance should be carried out when equipment is stopped and isolated wherever possible. If not, appropriate steps must be taken for protection of person carrying out the work.

There must be written health and safety instructions for all persons involved in the equipment including supervisors. These instructions shall include:

- Conditions and methods for use of equipment;
- Foreseeable abnormal situations and action to be taken if such a situation occurs

Effective measures must be taken to:

- Prevent access to any dangerous part of machinery; and
- To stop the movement of any dangerous part of machinery before any part of person enters a danger zone. (This should be done with guards or protection devices so far as it is practicable)

Guards must:

- Be appropriate for purpose;

- Be of sound construction;
- Be properly maintained;
- Not create health and safety risks;
- Not be easily removed;
- Be situated at sufficient distance from danger zone;
- Not unnecessarily restrict view of the work equipment; and
- Allow maintenance work to other areas without removal of the guard or protection device

Steps must be taken to minimise health and safety risk in the event of failure, namely:

- Ejected or falling objects;
- Rupture or disintegration of parts;
- Fire or overheating;
- Unintended or premature discharge of any article or of any gas, dust, liquid or vapour; and
- Explosion

Proper temperatures are to be maintained.

Equipment must have controls for:

- Starting;
- Changing speed, pressure, etc. which could increase risk to health and safety;
- Stopping in a manner reducing health and safety risks. If necessary, this shall involve disconnecting all sources of energy and have priority over other starting or changing controls;
- Emergency stops which shall have priority over all other controls

All controls shall be clearly visible and identifiable. No persons must be in any danger zone when operating any controls.

Control systems must be safe. This is to ensure:

- Loss of power does not increase risk to health and safety; and
- Prevents as far as is possible any work starting or being re-started whilst any person is in danger zone

There must be clearly identifiable systems to isolate equipment from its source of energy with trained competent employees. Work equipment must be stabilised by fixed clamping or otherwise where necessary for health and safety purposes.

Work equipment must be suitably marked for health and safety purposes and warnings and warning devices must be incorporated where appropriate.

#### **4.37 WORK AT HEIGHT**

Unite recognises that Work at Height commonly occurs throughout the business in many different scenarios. Unite will implement measures to prevent injuries to employees from falling from height which is a requirement under the Work at Height Regulations 2005. Working at height is working where a person could be injured by falling, even if it is below ground level. Issues relating to falling from buildings non work related activities is covered under 4.35 the Welfare Facilities section of this policy.

The specific corporate Work at Height Policy identifies what needs to be in place in order to:

- Avoid working at height, if reasonably practicable;
- Assess the risks of any work at height that cannot be avoided;
- Plan and organise any work at height;
- Take measures to prevent falls from height;
- Take measures to mitigate the effects of a fall should one occur

The policy also covers different types of work at height equipment, appropriate usage, training, maintenance, storage, records and statutory testing requirements.

#### **4.38 WORKPLACE TRANSPORT**

Unite shall protect employees and non-employees from the hazards associated with workplace transport at all of its sites. Establishing the means to assess the workplace activity to ensure sufficient controls are in place.

Workplace transport means any vehicles that are used in a work setting. Every year a significant number of people are killed by accidents involving vehicles in the workplace, and many more people are injured as well as significant damage to property.

The Workplace (Health, Safety and Welfare) Regulations 1992 requires that traffic routes are maintained and controlled, adequate segregation of vehicles and pedestrians, clear loading bays, adequate signage and good condition of floors and traffic routes. Workplace transport covers the use of all types of vehicles and powered mobile work equipment in workplaces but does not include vehicles travelling on the public highway. The specific corporate Fleet policy provides information regarding driving on the public highways.

Each city should ensure that they:

- Carry out a workplace transport risk assessment which identifies the hazards which considers the vehicles; the routes and roadways used by vehicles; what is required by the drivers, pedestrians and people in and around vehicles any vehicular movements associated with workplace transport and ensuring the necessary control measures are in place, monitored and reviewed. A corporate template is available which can be made site specific;
- Have arrangements for workplace transport activities (this includes bin lorries, deliveries, contractors)

## 4.39 YOUNG PERSONS AT WORK

The Management of Health and Safety at Work Regulations 1999 require that in addition to Unites' duty to assess the health and safety risks, there are particular responsibilities towards young people in their employ (this does not have to be paid work and includes volunteering or work experience):

- To assess risks to all young people under 18 years of age, before they start work;
- To ensure the risk assessment takes into account their psychological or physical immaturity, inexperience, and lack of awareness of existing or potential risks; and
- To introduce control measures to eliminate or minimise the risks, so far as is reasonably practicable

### 4.39.1 Important Definitions Concerning Young People and Children

Health and safety law defines people by age:

- A **young person** is anyone under eighteen years of age (young people);
- A **child** is anyone who is not over compulsory school age. He or she has not yet reached the official age at which they may leave school, also referred to as the minimum school leaving age (MSLA). (NB the oldest pupils of compulsory school age; those born in September for example, may be as old as 16 years and 10 months in year 11 before they leave school on the last Friday in June)

The law on working time defines a **young worker** as being below 18 years of age and above the MSLA.

Managers should:

- Let the parents/carers of any children below the MSLA know the key findings of the risk assessment and the control measures introduced, before the child starts work or work experience. This information can be provided in any appropriate form including verbally or directly to the parents or carers or, in the case of work experience, via an organisation such as the school, the work experience organiser, or if agreed with the parents, via the child him or herself, as long as this is considered a reliable method;
- Address certain specified factors in the risk assessment; and
- Take account of the risk assessment in deciding whether the young people should be prohibited from certain work activities, except in specified circumstances

Risk assessments have to be undertaken on an individual basis taking account of the specific job/tasks that the individual will be involved in and taking into account their lack of experience, maturity, and confidence, physical and psychological capacity as well as a lack of training.

Specific factors to take into account include:

- The fitting-out and layout of the workplace and the particular site where they will work;
- The nature of any physical, biological and chemical agents they will be exposed to, for how long and to what extent;
- What types of work equipment will be used and how this will be handled;
- How the work and processes involved are organised;
- Level of health and safety training given to young people;
- Risks from the particular agents, processes and work (including noise, vibration, heat)

Additional training, supervision and mentoring should be provided to take into account their inexperience and limited life skills. Refer to the Working with Young Persons or Work Experience Procedure and The Young Persons' Risk Assessment template and/or the Health and Safety Team for guidance. HR manages the requirements and need for Disclosure and Baring Service (DBS) checks upon our employees as necessary.

Children and Young Persons may be residents and in such cases consultation with the University, school or other appropriate body will take place to ensure the appropriate risk assessments and control measures are in place.

## PART 5 HEALTH AND SAFETY INFORMATION, INSTRUCTION AND TRAINING

Effective health and safety management requires competency across every facet of an organisation and through every level of the workforce. Health and safety information, instruction and training are an essential part in the effective development of employees to undertake their work safely at Unite. The Management of Health and Safety at Work Regulations 1999, Regulation 13, requires Unite to provide all employees with adequate health and safety training.

Unite employees need to be aware of general health and safety information relevant to working for the organisation and to be aware of the safety culture as well as the importance attached to health and safety by the Directors. This takes the form of formal training courses, information provided in the form of procedures and team talks as well as direct instruction in the form of briefings and mentoring.

Health and safety training for Unite employees enables them to fully understand the requirements and demands of their work and the arrangements for ensuring their health and safety, emergency procedures, first aid/accident reporting and the arrangements for health or safety assistance.

All new employees receive an Induction and Health & Safety Handbook which covers:

- Welfare Facilities including toilets/washing/drinking water facilities;
- Unite Health and Safety policy;
- Unite safety rules and procedures;
- Employees duties and responsibilities within health and safety law and company policies;
- Identification of Health and Safety Team;
- Health & Safety communication and consultation arrangements;
- Incident reporting procedures;
- First Aid arrangements and accident reporting procedures;
- Fire safety, emergency evacuation procedures and conducted tour of the premises;
- Specific work activities/use of work equipment/safe systems of work;
- Display Screen Equipment (DSE) workstation assessment;
- Relevant risk assessments;
- Information on health and safety topics including manual handling, slips and trips, asbestos, lone working, contractor control, security

Further training is also provided when new or increased health and safety risks associated with their work occur due to:

- Change in employees' duties or responsibilities;
- Introduction of new work equipment or technology or a change to existing equipment; and
- Introduction of a new system of work or a change to existing work systems

Refresher health and safety training and specialist job related training is provided as necessary to update employees on significant changes in legislation, health and safety policy, procedures or specific job competencies.

Health and Safety Training needs will be periodically reviewed by the Learning and Development Team. Managers should review at the time of annual employee's appraisals and following any changes in work practices, changes in an individual's capability, or changes in technology or equipment.

All training is coordinated and recorded through the HR in-house Learning and Development Team and recorded on personnel files. Many courses are delivered in house, however, where training is sourced externally then a robust system is in place to ensure competency of training providers and regular audits are undertaken.

## 5.1 TEMPORARY AND CASUAL EMPLOYEES TRAINING

Unite will take all necessary and reasonable measures to ensure the health and safety of any temporary and casual employees employed.

Unite has a duty to provide temporary employees with training and information regarding the organisations health and safety procedures and systems. All temporary employees receive relevant information on starting work including details of safe systems of work and action to be taken in the event of an emergency.

The information to be provided to any person Unite has employed under a fixed-term contract or through an Agency includes the following:

- Qualifications and skills required to do the work safely;
- Risks to health and safety identified by workplace assessments;
- Preventive measures to be taken to control health and safety risks;
- Safe working procedure; and
- Emergency procedures



## PART 6 HEALTH AND SAFETY COMMUNICAITON

Unite recognises that a good health and safety culture can only be built with effective communication. Health and Safety is communicated across the business at all levels including updates at Board level, at area management meetings, at managers' meetings, Health and Safety committee meetings (board, operational and local levels), site visits, information sheets, Team Talks, safety alerts, workshops and other initiatives and events.

Health and safety advice and information is available from the corporate Health and Safety Team.

There are a number of levels of health and safety committee meetings across the business. As well as the Group board health and safety committee these include the following:

### 6.1 OPERATIONS AND DEVELOPMENT HEALTH AND SAFETY COMMITTEE MEETINGS

The operations Health and Safety committee is chaired by the head of health and safety with attendance from the operations MD and directors from operations, HR, Estates and development.

The role of the committee is to:

- Develop, review and update the health and safety policy and annual plan;
- Ensure that resource is being allocated to ensure the policies are implemented across the business and reflected in localised procedures;
- Consider and agree solutions for HEALTH & SAFETY issues; and
- Consider the impact of legal changes on the business

### 6.2 REGIONAL HEALTH AND SAFETY COMMITTEE MEETINGS

The local Health and Safety Committee meetings are facilitated by the Health and Safety Team with a consistent approach to topics and agenda. They are attended by area managers, city managers, safety support and other interested parties.

The role of the committee is to:

- Ensure area specific health and safety issues are raised and addressed;
- Ensure effective consultation with employees on health and safety topics; and
- Share good practice

### **6.3 EMPLOYEE FORUM**

An employee forum is a gathering of representatives from around the business to come together to discuss issues and understand the direction of the business. There is the opportunity to discuss health and safety related subjects and issues. These meetings are held, as a minimum, quarterly.

## **PART 7 LEGAL REQUIREMENTS AND UPDATES**

Unite is committed to complying with Health and Safety legislation and other applicable legislation. Legal requirements are from legislation, statutes, regulations, codes of practice, directives, permits, licences, judgements, tribunals, conventions or protocols.

Unite has a standard approach to identifying changes in legislation which they record on a legal log managed by the Health and Safety Team as well as on a corporate risk register. The Service and Safety team keep abreast of legal updates via regulators, trade journals and trade associations. Sources include the internet, libraries, trade associations, regulators, legal services, Occupational Health and Safety institutes, consultants, manufacturers, suppliers, contractors and customers.

Relevant information and updates are cascaded as appropriate, applicable to the sector, activities, products, processes, personnel and location. Legal updates are provided to the Board and Senior Management Team on a regular basis. The Health and Safety Team provide advice and assistance to assist with the implementation and compliance with the legal requirements and standards.

## **PART 8 MONITORING THE EFFECTIVENESS OF THE POLICY AND ARRANGEMENTS**

It is paramount that the policy and arrangements detailed in this document are implemented throughout the business. Monitoring will identify strengths, good practice, weaknesses and opportunities for continuous improvement. Monitoring will take the form of reviewing outcomes of internal and external audits and site inspections, reviews of documentation and benchmarking.

### **8.1 INSPECTIONS**

Unite will implement a series of internal site inspections which will be undertaken monthly by the city teams on the Audim system. The question set and scoring has been devised to ensure the appropriate weighting for relevant statutory requirements. These will be reviewed on a regular basis. The outcomes, scoring and actions are reviewed by directors, area managers and city teams on a monthly basis and appropriate action undertaken.

Also, Hazard Spotting site inspections are undertaken by the Health and Safety Team, operational manager's, supervisors and service & safety operatives to identify strengths and weaknesses' and ensure that non-compliances are identified and rectified. The inspections are recorded formally on the 'Inspection check sheet' which will identify actions required and will be provided to the site and any other interested parties i.e. compliance, estates.

External inspections are also routinely undertaken by Fire Safety Officers. Other enforcing authorities also visit on occasion to undertake site inspections and include Health and Safety Executive (HSE), Local Authority, Environmental Health Officers (EHO's). All visits must be recorded so that actions and feedback can be shared across the business. The Health and Safety Team maintains a visit log.

## 8.2 AUDIT

Unite will implement planned internal audits and reviews by the Health and Safety Team which will include the scope of the management system and its application to ensure the effectiveness of the arrangements, compliance with Health and Safety legislation and meets the requirements of HSG65. It will encompass cities, estates and compliance teams. There will be a selection of topics or hazards to focus on i.e. Manual Handling, LOLER.

The audit programme includes:

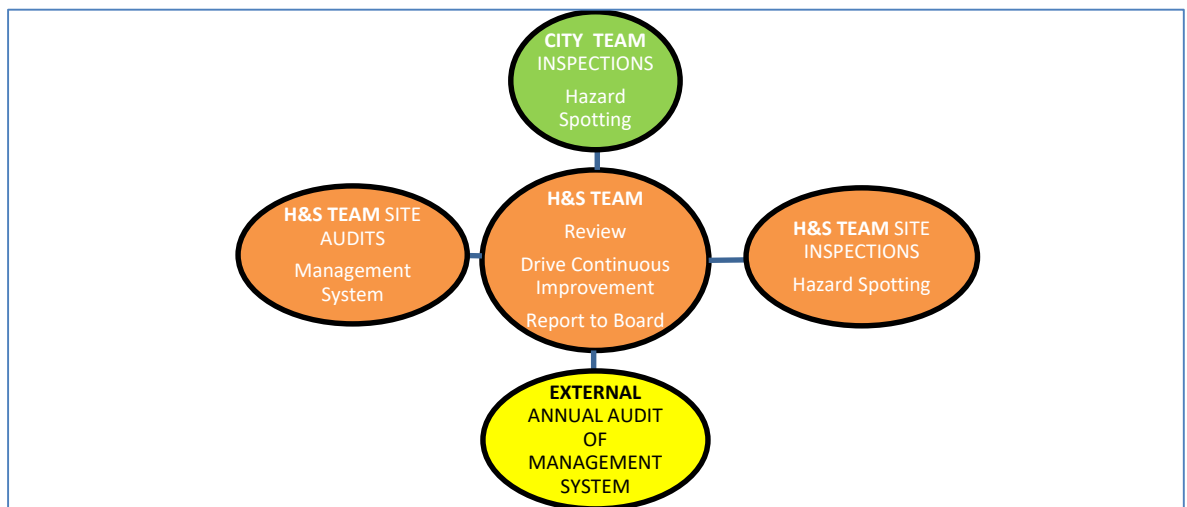
- Communication of the audit programme to relevant parties;
- Providing the resources necessary for the audit programme;
- Planning, coordinating and scheduling audits;
- Ensuring that audit procedures are established implemented and maintained;
- Ensuring the control of records of audit activities;
- Ensuring the reporting of audit results and audit follow up

External audits will be undertaken annually of the Health and Safety Management System to ensure its continuing suitability, adequacy and effectiveness. Opportunities for continuous improvement will also be identified and the need for any changes to the management system.

A report will be provided which shall consider the: progress against the current Health and Safety Plan; results of internal audits and site inspections; results of consultations; communication from external interested parties; Health and Safety performance; status of incident investigations; corrective actions and preventive actions; follow-up from previous management reviews; changing circumstances; legal updates and recommendations for improvement.

The management system is monitored, audited and reviewed by the Health and Safety Team at planned intervals to ensure its continuing suitability, adequacy and effectiveness. Reviews include: assessment opportunities for improvement and the need for changes to the occupational health and safety management system including policy and objectives.

The chart below demonstrates the inspection and auditing process as discussed.



## 8.3 REVIEWS

Corporate health and safety documentation is reviewed on an annual basis or in the event of significant changes. This includes the health and safety policy and associated topic specific policies and risk assessments.

Annual reviews take place with external providers including: for the safe contractor process; for the provision of temporary employees; for the lone worker protection system.

The Health and Safety Team support the procurement department to review and re-tender for contracts where safety is a consideration including fire extinguishers and water hygiene.

### 8.3.1 Continuous Improvement

The results of the inspections, audits, reviews and incident investigations will all contribute to identifying areas for continuous improvement and will be reviewed by the Group Health and Safety committee.

Other areas will also be considered to include new technology; good practice from other organisations; suggestions from employees; external parties such as insurers; knowledge and understanding of

health and safety issues; new or improved materials available; changes to the workforce competence or capability.

## **PART 9     SETTING OBJECTIVES**

### **9.1     HEALTH AND SAFETY PLAN**

A corporate Health and Safety plan is developed, agreed and implemented to ensure that there are clear goals and continuous improvement and is reviewed by the operations board monthly, the Group and operations Health and Safety Committees. Documented objectives are specific, measurable, achievable, relevant and timely. The plan provides direction to ensure compliance with legal requirements, continual improvement as well as identifying responsibility and resources.

#### **9.1.1     Benchmarking**

Benchmarking forms a part of the review process and provides the board with an evaluation of the current status and achievements.

Monitoring and measuring performance is undertaken against the following areas:

- Achievement of the Health & Safety Plan with an annual review;
- Accident Statistics;
- Proactive measures of conformance with programmes and controls and operational criteria;
- Reactive measures of ill health and historical data;
- Audit outcomes including conformities and non-conformities;
- Quantity and outcomes of site inspections;
- Feedback from external audits and inspections;
- Effectiveness of training;
- Perception surveys; and
- Employee participation

## **PART 10 DOCUMENT CONTROL**

### **10.1 DOCUMENT AND RECORD CONTROL**

All corporate health and safety records and documents shall be document controlled. Documents will be approved for adequacy prior to issue; reviewed and updated as necessary and re-approved; any changes and the current revision status of documents will be identified; the relevant versions of applicable documents are available at points of use; distribution of relevant external documents will be controlled; preventing the unintended use of obsolete documents and applying suitable identification to them if they are required for any future purpose.

### **10.2 STORING DOCUMENTS**

The relevant versions of documents will be available at the point of use as well as the main controlled copy being held electronically. Cities/departments will be responsible for their hard copies and updating control sheets and inserting updated information as provided.

All current documents relevant for business process are held on the Unite Students intranets site, accessible to the whole company.

### **10.3 ARCHIVING**

Documents will be archived and kept for the required amount of time. Any occupational health records will be stored by the current external provider. Any information relating to incidents will be stored for a maximum of 7 years. A log of potential exposure to asbestos or silica will be stored for 40 years.

## PART 11 LEGAL REFERENCES

- The Health and Safety at Work etc. Act 1974;
- The Management of Health and Safety at Work Regulations 1999;
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR);
- The Control of Asbestos at Work Regulations 2012 (amended December 2013);
- The Construction (Design & Management) Regulations 2015 (CDM)
- Confined Spaces Regulations 1997;
- The Health and Safety (Consultation with Employees) Regulations 1996 (as amended);
- The Control of Substances Hazardous to Health Regulations 2002 (COSHH);
- The Data Protection Act 1998;
- Health and Safety (Display Screen Equipment) Regulations 1992;
- Road Traffic Act 1988 (and subsequent amendments);
- The Electricity at Work Regulations 1989;
- Manual Handling Operations Regulations 1992 (as amended);
- Regulatory Reform (Fire Safety) Order 2005 & Fire (Scotland) Act 2005;
- Health and Safety (First-Aid) Regulations 1981;
- The Gas Safety (Installation and Use) Regulations 1998;
- The Workplace (Health, Safety and Welfare) Regulations 1992;
- Control of Noise at Work Regulation 2005;
- The Personal Protective Equipment at Work Regulations 1992 (As amended 2002);
- The Control of Vibration at Work Regulations 2005;
- Provision and Use of Work Equipment (PUWER) 1998;
- Lifting Operations and Lifting Equipment Regulations (LOLER) 1998;
- Pressure Systems Safety Regulations 2000;
- Work at Height Regulations 2005;
- Supply of Machinery (Safety) Regulations 2008

### 11.1 EU REGULATIONS

- The Registration, Evaluation, Authorisation and restriction of Chemicals (REACH);
- The Classification, Labelling and Packaging of substances and mixtures (CLP)

## 11.2 SPECIFIC APPROVED CODES OF PRACTICE REFERRED TO

- ACOP L8 "The Control of Legionella Bacteria in Water Systems";
- ACOP L24 Workplace health, safety and welfare. Workplace (Health, Safety and Welfare) Regulations 1992

## 11.3 GUIDANCE

- Managing for health and safety HSG65;

British Standards (these are the standards specifically referenced, there are however a number of further standards applied within the business):

- BS EN 13126: 2011 Building hardware – Hardware for windows and door height windows – Requirements and test methods Part 1: Requirements common to all types of hardware and Part 5: Devices that restrict the opening of windows and door height windows British Standards Institution;
- BS EN 8213-1: 2004 Windows, doors and roof lights – Part 1: Design for safety in use and during cleaning of windows, including door-height windows and roof windows – code of practice British Standards Institution;
- BS EN 13241-1 the Product Standard for powered doors and gates;
- BS EN 12604 & BS EN 12605 on mechanical requirements and tests;
- BS EN 12453 & BS EN 12445 on requirements and test for powered gates;
- BS EN 12635 on installation and use;
- BS EN 12978 on safety devices for power operated doors and gates