



# **Regular Cleaning**

## **Health & Safety Policy**

Date Reviewed: 01/04/2026

<b>Contents</b>	<b>Page</b>
Statement of intent	3
Responsibilities	5
Health & Safety Arrangements	11
Consultation with Colleagues	11
Risk Assessment	12
Manual Handling	15
Control of Substances Hazardous to Health	17
Legionella	18
Asbestos	19
Display Screens and Equipment	20
Noise	21
Personal Protective Equipment	22
Electricity	23
Work Equipment	24
First Aid	26
Working At Height	28
Fire Management	29
Training and Competence	31
Accident, Incident, Near Miss Reporting & Investigation	32
Alcohol & Drugs	35
Workplace Health, Safety and Welfare	36
Control of Contractors	38
Permits to Work	39
Workplace Transport	40
Health & Safety Performance Monitoring	42
Management Reviews	44
Company Organisational Structure	46

## Statement of Intent

Regular Cleaning is certified to ISO 45001; this certification is applicable to all activities at our Service Support Centre and Client sites. The policy and this supporting statement of intent are applicable to all locations operated by Regular Cleaning Ltd.

We recognise that fostering a positive safety culture will improve health and safety performance throughout the Organisation, and as such we are fully committed to the health, safety, and welfare of our colleagues, service partners and other parties who may be affected by our activities. We will ensure Legislative compliance as a minimum standard. Our Organisation will also ensure that it complies with Approved Codes of Practice, industry best practice and guidance when implementing tasks.

We will provide according to the Health and Safety at Work etc. Act 1974 - so far as is reasonably practicable:

- Safe plant and machinery
- Safe systems of work
- Safe handling, storage and use of substances
- Information, instruction, training and supervision
- Safe access and egress
- A safe working environment

As a responsible organisation we are committed to prevention and reduction of all adverse incidents, all colleagues and service partners are required to report unsafe acts or conditions immediately and take appropriate actions to avoid injury to themselves, colleagues and third parties. All reported incidents will be investigated and corrective and preventive action taken to prevent re-occurrence.

We are committed to the continuous improvement of our Health and Safety Management systems using proactive auditing and the encouragement of colleague involvement in our decision-making processes.

A workplace cannot thrive to the best of its ability and prosper in the future if it is not a safe workplace. These therefore are the basic principles we will seek to reflect in our safety decision-making. We recognise that safety involves everyone and that every colleague has a responsibility in this. We will endeavour to support and provide a system of safety that helps everyone make safe decisions in their workplace and we aim to influence the safety culture of our Company by guiding all our colleagues in safe working practices.

Safety is a dynamic process; we recognise that our safety systems must be flexible and responsive to changes in law, technology, advancements in industry, client requirement and cultural change. This requires us to periodically revise our statements, policies and procedures to ensure the continued provision of safety and compliance with regulations under the HSWA 1974.

This policy, and the procedures and processes that support it will be revised on a yearly basis. Any significant changes to this policy will be communicated to our colleagues, service partners or any other person who may be affected by our operations



Pauline Carrigan

Chair

1st April 2026

## Responsibilities

### Chair

The Chair has ultimate responsibility for Health, Safety and Welfare of all Regular Cleaning colleagues and the implementation of this policy. They will ensure that suitable resources are available to ensure that the aims of this policy are achieved. The Chair will provide support for appointed Executives and ensure that they are aware of their responsibilities and will encourage them to promote a positive health and safety culture. The Chair will ensure they are provided with the resources to maintain a safe working environment for all Colleagues, Sub-Contractors and other parties who may be affected by our activities.

### Chief Executive Officer

The CEO will Champion health and safety strategies and initiatives with the other the Executives and the Chair, he will ensure that Health and Safety Management System (HSMS) is supported by the top team and that necessary resources are established and effectively maintained. He will ensure that teams working under their control are aware of their health and safety (H&S) duties and monitor their effectiveness.

### Executives

The Executives will fully support the HSMS and have a responsibility to ensure that the teams under their control comply with the requirements of this policy. They will provide information and applicable reports regarding health and safety issues on areas under their control. The Executives will also liaise with the Head of ESG to ensure that H&S issues are highlighted and addressed.

They will ensure that Teams under their control are aware of their responsibilities and ensure that that they are supported in their roles to maintain effective control of persons within their areas of their responsibility.

### Head of Environment, Social & Governance

The Chair has appointed the Head of ESG who has day-to-day responsibilities for ensuring that this policy is put into practice and ensuring that daily operations and tasks carried out by our colleagues are suitably assessed and reviewed, and that H&S standards are maintained throughout the organisation. He will ensure that that client site visits are completed and liaise with clients where necessary on issues that relate to H&S.

- > The Head of ESG also has responsibilities to:
- > Evaluate Regular Cleaning compliance to current UK legislation ensuring where risk(s) exist that they are communicated and addressed appropriately.
- > Providing strategic guidance to the Executive to identify new or emerging risk(s) and to continually improve H&S performance and mitigations are implemented.
- > Drive forward H&S culture in collaboration with Heads of Department and Senior Leadership team to effect positive change through innovation, education, mentoring and sound leadership.
- > Ensure that the HSMS is reviewed frequently and communicated to all stakeholders when amendments have been made.
- > Ensure that RIDDOR reports are completed in a timely manner to the enforcing authorities.
- > Liaise with relevant enforcing authorities (HSE etc)
- > Communicate and provide statistical data relating to H&S performance and areas of risk and non-compliance to company policies and procedures.
- > Provide Clients with relevant H&S advice and documentation that relates to Regular Cleaning operations on their site.
- > Promote a positive H&S culture within the workforce and wider stakeholders
- > Facilitate the development of safe systems of work with all colleagues, service partners and clients, in all sites that Regular Cleaning operate.
- > Ensure that risk assessments and methods statements (RAMS) are communicated and provided to colleagues, service partners and clients.
- > Ensure that annual H&S reviews of service partners performance are conducted and where poor performance is identified it is addressed appropriately.

## Heads Of Department / Senior Leadership Team

The Heads of Department and Senior Leadership Team will fully support the HSMS to ensure that colleagues under their control are aware of their H&S responsibilities. Leading by example they will set the culture and ensure that all colleagues understand their responsibilities to always work safely and to report unsafe conditions or situations.

The Head of Department and Senior Leadership Team also have responsibilities to:

- > Support the Executive in the delivery of Regular Cleaning H&S legislative requirements.
- > Ensure that H&S within their area of responsibility is managed appropriately and that adequate resources are in place.
- > Support ESG initiatives and innovation that reduce risk and improve H&S performance.

- > Ensure that H&S information, procedures and policies or their amendments are effectively communicated to all colleagues.
- > Ensure that annual reviews of H&S performance in their area of responsibility are completed and that poor H&S performance is addressed appropriately.
- > Promote a positive H&S culture, ensuring that unsafe acts or conditions are challenged and prohibited.
- > Ensure that there are adequate risk assessments and method statements in place that facilitate safe systems of work
- > Ensure that all colleagues within their area of responsibility understand and know the reporting procedures for near miss, incident and accident reporting.
- > Ensure that all serious near misses and adverse incidents are reported to the ESG department immediately.
- > Ensure that all H&S risk assessments and method statements are reviewed regularly or after any incident-accident, serious near miss and after any legislative change etc.
- > Ensure all colleagues have completed H&S mandatory and refresher training and that it is completed annually.

## **Operations Management Team (Operation Managers, Service Delivery Managers, Team Leaders)**

The Operations Management Team will fully support the HSMS and are empowered to ensure that H&S issues applicable to the operations and tasks under their control are effectively managed, carried out in a safe manner and that all colleagues under their control are suitably trained.

The Operations Management Teams also have responsibilities to:

- > Support the Heads of Department and Senior Leadership Team in the delivery of Regular Cleaning H&S legislative requirements.
- > Support ESG initiatives and innovation that reduce risk and improves H&S performance
- > Promote a positive H&S culture, ensuring that unsafe acts or conditions are challenged and prohibited.
- > Ensure that they understand Regular Cleaning H&S policies and procedures and that these are implemented within their area of responsibility.
- > Ensure they report immediately any adverse incidents to their Head of Department, Senior Leadership Team and ESG Department immediately.

- > Ensure that all colleagues within their area of responsibility know how to report unsafe conditions or equipment through Regular Cleaning reporting system
- > Ensure that only Regular Cleaning approved equipment and materials are used in client sites and the SSC.
- > Ensure that all equipment and materials supplied to colleagues are maintained, serviced and PAT tested appropriately annually and in accordance with the manufacturers recommendations and industry best practice.
- > That they review risk assessments and method statements annually or after any serious near miss, incident or accident and that they are communicated and understood by all colleagues within their area of responsibility.
- > Ensure that all site documentation under their control reviewed monthly ensuring any deviations are corrected immediately.
- > That colleagues have immediate access to H&S information via site files, digital platforms and the company website, and that they know how to access that information.
- > Ensure every site under their control is audited monthly as part of the integrated audit and the Operations Audit schedule.

## Health, Safety & Quality Manager

The Health, Safety and Quality Manager has responsibilities for managing Regular Cleaning HSMS and Quality management systems and for ensuring that policies and procedures are appropriate and reviewed annually. Ensure operational tasks are suitably assessed and reviewed, and that H&S standards are maintained throughout the organisation.

The HS&Q Manager will:

- > Support the Head of ESG in the delivery of Regular Cleaning H&S legislative requirements.
- > Promote a positive H&S culture, ensuring that unsafe acts or conditions are challenged and prohibited.
- > Drive forward H&S culture in collaboration with Heads of Department, Senior Leadership Team and the Operations Management Teams to effect positive change through innovation, education, mentoring and sound leadership.
- > Support ESG initiatives and innovation that reduce risk and improves H&S performance.
- > Manage Regular Cleaning HSMS ensuring that it is subjected to a thorough review within a period not exceeding 12 months or sooner as required due to new or emerging risk(s), after a serious incident, Health and Safety Executive intervention or legislative changes.
- > Contribute towards Regular Cleaning Management Review processes communication current H&S performance, risks and opportunities to improve.

- > Ensure that H&S information, procedures and policies or their amendments are effectively communicated to all colleagues.
- > Review all H&S policies and procedures and after any serious incident or legislative changes annually.
- > Ensure that all serious near misses, accident and incidents are thoroughly investigated.
- > Ensure that all risk assessments and method statements are reviewed regularly by the Operations Management Teams and supported by the ESG Department
- > Ensure that CoSHH assessments are produced providing comprehensible information for colleagues relating to substances used by them.
- > Ensure that manual handling assessments are conducted and where required provide suitable training for colleagues.
- > Ensure that the H&S Advisors complete annual site-specific H&S Audits in accordance with ESG audit schedule.
- > Manage the onboarding of current and future service partners ensuring that H&S reviews of service partners are completed annually.

## Health & Safety Advisors

The Health and Safety Advisors have responsibilities for supporting and promoting awareness and understanding of Regular Cleaning HSMS ensuring that policies and procedures are known by all colleagues. Ensure operational tasks are suitably assessed and reviewed, and that H&S standards are maintained throughout the organisation.

The H&S Advisors will:

- > Assist the HS&Q Manager in the day-to-day management of H&S ensuring that all departments' conduct their tasks and activities in a safe manner that aligns to Regular Cleaning Policies and Procedures.
- > Support the HS&Q Manager in the delivery of Regular Cleaning H&S legislative requirements.
- > Promote a positive H&S culture, ensuring that unsafe acts or conditions are challenged and prohibited.
- > Complete at least 50 site specific H&S audits as directed by the HS&Q Manager.
- > Provide the Operations Management Teams with frequent analysis of safety performance, best practice and highlight opportunities for continuous improvements.
- > Support and mentor Operations Management Teams by raising awareness of Regular Cleaning H&S Policies and Procedures and their implementation.
- > Engage with the Operations Management Teams to support the construction and review of risk assessments and the implementation of safe systems of work.

- > Construct risk assessments (including pregnancy assessments) under the direction of the HS&Q Manager to address new or emerging risks and hazards.
- > Conduct thorough serious near miss, incident and accident investigations as directed by the HS&Q Manager to prevent recurrence.
- > Conduct additional PAT testing of equipment not under service and maintenance contracts as directed by the HS&Q Manager.
- > Perform slip tests in client sites and at the SSC as directed by the HS&Q Manager and to support the Operations Management Teams.

## All Colleagues

- > All colleagues have responsibilities for H&S under the Health and Safety at Work Act 1974. These responsibilities are laid out on the Health and Safety at Work poster (section 7 & 8) which is displayed in prominent places within the workplace. Colleagues should be aware of their responsibilities.
- > All Colleagues must:
- > Bring to the attention of the direct line manager and Regular Cleaning any unsafe practice or condition and not place themselves in danger.
- > By any deliberate action that may place a colleague, other colleagues of service partners and clients at risk of injury, this may be considered as an act of gross misconduct and dealt with accordingly.
- > Report and bring to the attention of direct line manager and Regular Cleaning any significant defect with plant or equipment they are using.
- > Not interfere with, abuse or knowingly damage equipment that is provided in the interest of H&S.
- > Use Personal Protective Equipment (PPE) that has been supplied by Regular Cleaning to reduce the risk of harm, and aid Regular Cleaning comply with its legislative responsibilities.
- > Adhere to safe working practices and Regular Cleaning policies and procedures that have been developed to reduce the likelihood of harm.

# Health & Safety Arrangements

## Consultation With Colleagues

Colleagues will be advised of any changes or future developments to Regular Cleaning H&S policies, procedures or safe systems of work. Colleagues will also be encouraged to assist in the continuous improvement of our HSMS.

Copies of this policy are available through:

- > The company shared drive in the Quality Management System under Policies.
- > Service Support Centre displayed on the HSQE Noticeboard
- > Within all site-specific folders via the QR Code contained within (that directs colleagues to the electronic version on the company website)
- > On the company website
- > Colleagues can also access the H&S Policy through the “employee portal” found on the Regular Rewards platform that all colleagues have direct access to.

A copy of the policy will be issued to all new colleagues on commencement of employment with Regular Cleaning and communicated to all colleagues when significant changes to the policy have occurred.

Regular Cleaning will take the opportunity to update Colleagues on H&S Issues during:

- > Executive Town Hall Presentations
- > Senior Leadership Team Meetings
- > Departmental Meetings
- > Operations Management Team Meetings
- > Site Specific Team Meetings
- > Toolbox talks,
- > ESG Department Site visits,
- > Training presentations
- > Make a Difference Senior Leadership Team Site Visits
- > or written communications.

## Risk Assessment

Regular Cleaning will ensure that risks arising from our activities are suitably assessed, to this end we will comply with the Management of Health and Safety at Work Regulations 1999 and other regulations regarding risk assessment and their approved code of practices.

The Company will:

- > Ensure colleagues are made aware of the risk assessments and supporting method statements applicable to tasks they are assigned, they will endeavour to ensure that colleagues are involved in the risk identification and risk assessment process.
- > Ensure all colleagues will follow control measures identified within a risk assessment and that they are adhered to and that control measures are reviewed annually or after any serious near miss, accident, introduction of new processes, significant changes of colleagues or legislation etc.
- > Ensure that the Operations Management Team consult colleagues in identifying ineffective control measures or measures that may be more effective to prevent damage to equipment, buildings or harm to people.
- > Ensure that risk assessments will be reviewed as directed by the Heads of Department when applicable and that the Operations Management Team is supported by the ESG Department at regular periods to determine the validity of the findings. Assessments will also be reviewed after the introduction of new equipment, new skills, significant change in colleagues, change in location, after an adverse incident or legislative change.
- > Ensure that under the Management of Health & Safety at Work Regulations 1999 (MHSAW) the company has a special duty of care placed upon it, to ensure the following class of colleagues are taken into consideration.

The Heads of Department and the Senior Leadership Team must ensure that all colleagues under their control have access to all risk assessments they require to ensure they understand all the hazards identified and controls that have been implemented to prevent harm. All colleagues must know that risk assessments can be accessed immediately through:

- > Site Specific Folder (in hard copy)
- > Through QR Codes (contained within Site Specific Folders)
- > Company Client Folders (contained within company shared drives for those with access)
- > Through our service partner I.T. Platform i.e., Facility Apps

## New And Expectant Mothers

Under these regulations The Company accepts the special duty of care to this class of colleague. It is the responsibility of the colleague to inform the company of their condition or the recent birth of a child in writing. Only then can the Company fulfil its obligations under these regulations.

The Company will:

- > Conduct a pregnancy risk assessment to determine the kind of work the colleague is doing which could involve risk by reason of her condition, to the H&S of a new or expectant mother or that of her baby from any processes or working conditions, or physical, biological or chemical agents.
- > Continually review any pregnancy risk assessment in collaboration with People Relations, Head of Department, Senior Leadership Team and Operations Management Teams if any duties or conditions have been amended or will likely change.
- > Take any action the company are required to take under the relevant statutory provisions that would avoid the risk.
- > If reasonable alter working conditions or hours of work in collaboration with People Resources, Heads of Department. Senior Leadership Team, and the Operations Management Teams.
- > Comply where a new expectant mother works nights and when a certificate from a registered medical practitioner shows it is necessary for her H&S to restrict any period of such work identified in the certificate.

## Protection Of Young Persons

Under these regulations The Company has a duty that any young persons employed are protected at work from any risks to their H&S which are a consequence of their lack of experience, or absence of awareness of existing or potential risks of the fact that young persons have not yet fully matured.

The company will not place any young person at risk. All young persons before being employed or undertaking any work experience must be authorised by Executive member of the department they will work.

The Company will:

- > Carry out specific assessment(s) to determine the risk to this type of colleague, as a young person is classified as any person under 18 years of age at commencement of their employment.
- > The hiring or sponsoring department will ensure that all welfare arrangements and emergency procedures are suitable for the young person's needs.
- > The hiring or sponsoring department will ensure that all training and support are provided and documented appropriately.

- > Restrict any work or activity which is beyond their physical or psychological capacity.
- > Prevent harmful exposure to agents which are toxic or carcinogenic etc or which in any way chronically affect human health.
- > Restrict any harmful exposure to radiation sources
- > Involve them when risk of accidents which may reasonably assumed cannot be recognised or avoided by a young person.
- > Restrict work that involves extreme cold or heat, noise or vibration.

The ESG Department in collaboration with People Relations, Heads of Department, Senior Leadership Team and the Operations Management Team will construct the appropriate risk assessment, providing a copy for the young person's legal guardian to ensure that all hazards, risks, emergency procedures and control measures are documented and agreed before the young person starts any type of work with the company.

## Manual Handling Operations

Regular Cleaning will so far as reasonably practicable to avoid manual handling or to reduce the risk of injury to as low as reasonably practicable. The company will assess the risk of injury from any hazardous manual handling operations that cannot be avoided and reduce the risk of injury to as low as reasonably practicable.

The Company will:

- > So far as reasonably practicable avoid the need for colleagues to undertake any manual handling at work which will involve a risk of their being injured.
- > Where it is not reasonably practicable to avoid the need for our colleagues to undertake any manual handling at work which involve a risk of being injured make a suitable and sufficient risk assessment of all manual handling operations.
- > Take appropriate steps to reduce the risk of injury to those colleagues arising out of the assigned tasks any manual handling operations to the lowest level reasonably practicable.
- > Construct a specific “Manual Handling” risk assessment ensuring that it is reviewed annually or when there is reason to suspect that it is no longer valid, or if there has been a significant change in handling operations which it relates to
- > Where reasonably practicable provide mechanical aids to reduce the risk of injury, ensuring that they are maintained and serviced in accordance with the manufacturer’s recommendations.
- > Consider ergonomics when assessing and detailing the safe systems of work to reduce manual handling risks
- > Consider the physical suitability of the colleagues and take the appropriate steps reduce the risk of injury and harm.
- > Provide the colleagues with appropriate Personal Protective Equipment and clothing, that does not restrict the wearers movements.
- > Ensure that colleagues have received suitable Manual Handling training and information as needed to enable the task to be done safely. If required specialist training will be provided to colleagues requiring, it.
- > Identify any colleagues specifically at risk such as colleagues who may be pregnant, have a disability that would affect handling, had a recent or previous injury, young or older colleagues etc.
- > Provide health surveillance as result of any early signs of work-related ill-health or if they are exposed to certain health risks or acting on the results of medical assessments.
- > Colleagues adhere to safe working practices that are implemented to reduce the likelihood of harm.

- > Ensure that colleagues use any equipment provided in the interest of their health, safety and welfare in the manner they are to be used and in accordance with their training, risk assessment and safe systems of work.
- > Ensure colleagues know how to report any manual handling concerns they have to their direct line manager immediately.

## Control Of Substances Hazardous To Health

The Company has a duty to assess the risks from the use of hazardous substances, including ensuring that there are arrangements to deal with and accidents, incidents or emergencies resulting from any serious spillages. We will ensure that an assessment of those substances is carried out to identify any H&S risks from the use, storage, handling or disposal of any substance provided or authorised by Regular Cleaning. In addition, the company will reduce so far as reasonably practicable to preventing exposure to such substances.

The Company will:

- > Not conduct any work which is liable to expose any colleague to any substance hazardous to health without having assessed the risk created by that work.
- > Implement the requirements of the regulation and put them into practice.
- > Prevent exposure of colleagues to hazardous substances through substitution of harmful to less harmful substances and provide appropriate:
  - Safe Systems of Work
  - Ensure adequate Ventilation
  - Adequate Personal Protective Equipment
  - Suitable arrangements for the safe handling, storage and transport of substances hazardous to health
  - The adoption of suitable maintenance procedures
  - Appropriate hygiene measures including washing and toilet facilities
- > Ensure that all implemented controls are monitored and that they are properly used and effective and that they are reviewed frequently.
- > Monitor and frequently review manufacturers Safety Data Sheets (SDS) to ensure exposure to hazardous substances routes of entry via all routes are monitored and that appropriate controls are in place.
- > Where a colleague may have been exposed that they are under the appropriate health surveillance coordinated through the People Relations Department.
- > Provide every colleague with suitable and sufficient information, instruction and training for the substances which they will be exposed to.
- > Implement and communicate emergency procedures relating to all substances that have been provided or authorised by the company including:
  - Procedures for the provision of first aid facilities
  - Information on any specific hazards likely to arise at the time of an accident or incident
  - Relevant information to call for emergency assistance from the emergency services
  - On site emergency plans and spill equipment or site-specific emergency response plans etc.
- > Ensure that site folders accurately identify Regular Cleaning authorised chemicals / substances for use on specific sites, managed and approved by the Head of Department, Senior Leadership Team and Operations Management Teams.
- > Regularly review the site folders approved chemical lists which are managed by the Operations Management Teams.

Colleagues must not use substances provided by a client, service partner etc under any circumstances without authority of the company.

## Legionella

The Company understands that a suitable and sufficient assessment must be conducted to identify and assess the risk of exposure to Legionella bacteria from work activities and water systems at the SSC and client sites and to implement any precautionary measures that are required. The Company as the duty holder will ensure that a risk assessment is conducted for the SSC. Client sites are their responsibility which Regular Cleaning operate however the Heads of Department, Senior Leadership Team and Operations Management Team supported by the ESG Department will ensure all colleagues are consulted and protected therefore:

The Company will:

- > Ensure that a suitable and sufficient risk assessment is undertaken and that this is reviewed frequently.
- > That the person conducting the risk assessment is competent to do so and provides sound advice on prevention and control of exposure measures.
- > Ensure that the “appointed person” has sufficient authority, competence and knowledge of the installation.
- > Appoint a “responsible person” to make reasonable enquires to ensure that organisations such as water treatment companies etc are competent and suitably trained and have the necessary equipment to carry out their duties in the written scheme safely and adequately, and for day-to-day management.
- > Consult colleagues on the identified risk of exposure and the measures and actions taken to control the risks.
- > Ensure all colleagues involved in the management of Legionella have received suitable training and that it is refreshed frequently.
- > Ensure that the arrangements for managing Legionella are appropriately documented in a written scheme of implementation, and that it is clearly communicated.
- > Ensure that adequate maintenance, examination, repairs and test control measures are in place and that all records are retained as necessary.
- > Ensure that testing of water quality is conducted in accordance with the risk assessment.

## Asbestos

Regular Cleaning does not have any asbestos containing materials (ACM) at our Service Support Centre (SSC). Colleagues working in client sites may be doing so in buildings that do contain asbestos which is under the responsibility of the owner, managing agent or client. The company will request a copy of the site asbestos survey, or risk assessment and confirmation if ACMs are present or not specifically for sites that were built before 2000. Sites that were built after the year 2000 should not have asbestos present.

The Company will:

- > Not carry out any work in any site or on any surface that is likely to expose any colleagues to asbestos.
- > Ensure that regular reviews of known sites containing asbestos for damage or updates in the client Asbestos Management Plan (AMP) that is relevant to our operations through their asbestos surveys, risk assessments are obtained through client portals or on request.
- > Ensure that under no circumstances that work in any areas such as plant rooms, flooring, external roof spaces and mechanical and electrical spaces etc is conducted until a suitable risk assessment has been made and adequate control measures have been implemented.
- > Where any colleagues may encounter asbestos, the company will ensure that site specific risk assessments and safe systems of work are implemented and that adequate controls are in place.
- > As necessary health monitoring and health surveillance will be implemented through our Occupational Health Service Provider.
- > Colleagues will receive specific information via toolbox talks as necessary if they are likely to be exposed to asbestos in any form.
- > The Company will ensure that colleagues understand and know the measures for hygiene, emergency, decontamination of equipment, waste generated through cleaning operations.
- > Ensure colleagues know the process and arrangements to deal with accidents, incident and emergencies in sites that contain ACM.
- > Ensure that colleagues report any incidents that they have broken or encounter ACM, all incidents must be reported immediately.
- > If you believe there is an ACM within the workplace report it immediately to your direct line manager.

## Display Screens And Equipment

DSE are devices or equipment that have an alphanumeric or graphic display screen and includes display screen, laptops, touch screens and other similar devices. Colleagues that have been provided with work equipment that falls within this category will be provided with suitable controls and measures to protect their H&S.

The Company will:

- > Consult all colleagues that are provided with DSE equipment to ensure that any potential H&S problems are identified and managed appropriately.
- > That any DSE equipment is maintained appropriately and as part of our cyber security protocols they are changed at least 5-7 years.
- > Analyse workstations to access and reduce risks, ensuring common controls are implemented.
- > Provide information and training as necessary for colleagues
- > Provide eye and eyesight tests on request, and special spectacles if needed.
- > Conduct colleague DSE assessments frequently ensure that all assessments are reviewed, and any necessary preventative actions are taken.
- > Ensure that suitable number of colleagues are trained as DSE assessors
- > Heads of Department, Senior Leadership Team are to ensure that colleagues identified as DSE users are given suitable breaks and changes in daily task so that work is interrupted to enable rest breaks.
- > Ensure that colleagues know the process for reporting any incidents of ill health through the company incident reporting processes.
- > Provide height adjustable desks at the SSC to enable colleagues to stand up when working.
- > Provide DSE equipment for colleagues that hybrid work at home as necessary (screen, chairs, mouse etc)
- > Provide specialist equipment as necessary because of any occupational health assessment.
- > Sanitise all workstations daily at the SSC.
- > PAT test all equipment annually to ensure that equipment is safe to use.
- > Implement a desk booking system at the SSC to ensure that desks are allocated according to need.
- > Implement a clear desk policy to ensure that workstation is clear of debris and colleagues personal work folders etc.
- > Ensure that the system to report faulty or damaged equipment is known by all colleagues and the SSC and assigned DSE users.
- > Ensure that the SSC lighting and workplace conditions are maintained in accordance with current legislative requirements.

## Noise

The Company has a duty to prevent or reduce the potential of colleagues being exposed to noise while at work. The company will ensure that all sites we operate are assessed if it is suspected that noise actions levels will be reached or if the potential is likely to be reached during the risk assessment process. To ensure that we do not expose colleagues to excessive noise:

The Company will

- > Undertake site specific risk assessments to identify where there may be a risk from noise and who is likely to be affected.
- > Estimate the work that colleagues will do and the way they work to identify any variations.
- > Provide hearing protection where it is needed above what has been achieved on site above client and building specific noise control measures.
- > Provide hearing protection for colleagues that as for it and if their noise exposure is between the lower and upper exposure action values before they are beginning any work at no cost to the colleague.
- > Ensure that colleagues only wear hearing protection that has been supplied and approved by The Company that provides the best noise reduction value (Single Number Rating).
- > Train colleagues how to wear, use, clean and maintain any hearing protection that has been provided.
- > Provide suitable storage facilities for colleagues to prevent damage to hearing protection.
- > Provide colleagues with a hearing test that is conducted by a qualified and competent service partner on request or after any hearing conservation programme.
- > Where colleagues have been exposed to excessive noise place colleagues under health surveillance and retain those records accordingly.
- > Ensure that colleagues all know the process for reporting any hearing problems or damage to their line manager immediately through the company reporting processes.

If you cannot hear a normal conversation whilst standing 3 feet from another colleague or person then there may be noise issue, report it to your line manager.

## Personal Protective Equipment

PPE is defined as “all equipment (including clothing affording protection against the weather) which is intended to be worn by a colleague at work which protects the colleague against one or more risks to that colleagues H&S, an any addition or accessory designed to meet that objective. The company will always regard PPE as a last resort to protect colleagues against H&S risks. To ensure that we provide and protect our colleagues the company will:

The Company will:

- > Ensure that suitable protective equipment is provided to colleagues that may be exposed to a risk to their H&S while at work except where and to the extent that such risk has been adequately controlled by other means which are equal and more effective.
- > Ensure that The Company selects the most suitable PPE for the hazards that are known or identified through the risk assessment process.
- > Ensure that any PPE provided is maintained (including replaced or cleaned as appropriate) and in an efficient state, in efficient working order and in good repair.
- > That all colleagues know the process for requesting worn or damaged PPE.
- > The Head of Department, Senior Leadership team and the Operations Management Team ensure that effective maintenance systems are in place that include:
  - Examination – checking for faults, damage wear and tear
  - Tested – to ensure PPE is operating as intended
  - Ready for use – may lose effectiveness if it is wet from sweating etc
  - Clean – that is clean including disinfection if appropriate
  - The state of repair – that the PPE is good working order etc
  - Replacement – that worn or damaged PPE is replaced immediately.
- > Will not charge colleagues for PPE whether it is returnable or otherwise.
- > Ensure that PPE will be suitable and sufficient and, if necessary, considering any protected characteristic as set out in the Equalities Act.
- > Ensure that if more than one item of PPE is to be worn, they will be compatible with each other and when used together and that they should adequately control the risks.
- > Ensure that colleagues wear any personal protective equipment supplied by The Company, in the interest of their health and safety.
- > Ensure that colleagues fully understand their responsibilities to wear any PPE that has been provided by The Company.
- > Ensure that any loss or significant damage to equipment is be reported immediately, to ensure that timely replacements are provided.
- > Clearly communicate that the failure to use PPE that has been provided to comply with legislative requirements or company policy may be seen as gross misconduct.

Personal Protective Equipment is provided to protect and reduce the likelihood of harm, wear it, use it, and report it if damaged or lost.

## Electricity At Work

Electricity can cause severe injuries or worse, cause damage to property and equipment. Colleagues that are using equipment of managing the SSC must understand the hazards and control measures that are in place to prevent harm and injury occurring. There is a risk that poor maintenance and installations, electrical faults can lead to other incidents such as fires etc. therefore The Company will ensure that we take all measures to prevent harm occurring, or damage to equipment and property.

The Company will:

- > Ensure that all risk assessments consider the risks associated with electricity when it is appropriate.
- > That colleagues working on or with electrical equipment or systems are competent for the task they are undertaking.
- > That all electrical installations are safe that that they conform to the appropriate standards.
- > That existing installations are maintained and in a safe condition.
- > Provide sufficient socket outlets to prevent overloading a cause of fires.
- > Choose equipment that is suitable for the environment colleagues are working in and the equipment that will be used.
- > Make sure equipment is safe when supplied and that it is maintained in a safe condition in accordance with the manufacturer's recommendations.
- > Ensure that preventative maintenance on all electrical equipment and installations is conducted.
- > Ensure that all colleagues that use electrical equipment are trained and know how to conduct Pre-User inspections of that equipment.
- > Ensure that electrical equipment is frequently PAT tested by a competent service engineer.
- > Ensure that all colleagues using electrical equipment know the process to Isolate, Tag and Report electrical equipment to prevent harm or damage occurring.
- > Ensure the SSC fixed services are tested at least every 5 years.
- > Portable work equipment used on client sites is tested at least yearly by the service provider and that these are recorded under the direction of the Head of Department, Senior Leadership team and Operations Management Team.
- > Portable Electrical appliances at SSC are tested annually.

## Work Equipment (Provision & Use Of Work Equipment)

The Company will ensure that it only operates equipment that is suitable for the intended use, safe, maintained and in a safe condition and inspected to ensure that it is correctly installed and does not subsequently deteriorate. The Company defines work equipment as any machinery, appliance, tool or installation for use at work (whether exclusively or not). This includes equipment which colleagues provide for their own use at work. The company will ensure that we comply with necessary requirements to fulfil our duty.

The Company will:

- > Only Provide and select work equipment that is suitable for the purpose for which it is provided and in the working conditions it is being used in.
- > Will ensure that all equipment hazards are included when risk assessing any task work equipment is provided to colleagues.
- > Ensure that equipment provided are sourced from reputable suppliers and that design and manufacturing standards are appropriate.
- > The workplace design is included in the risk assessment and equipment procurement processes.
- > Ensure that all work equipment is maintained and in an efficient state at appropriate intervals, in working order and in good repair, and when appropriate has an equipment log.
- > That all inspections and maintenance are conducted by competent service engineers.
- > Ensure that Department Heads, Senior Leadership Team and the Operations Management Team ensure maintenance is conducted on all equipment under their control and that it is recorded.
- > Ensure that where equipment and machinery have specific risks that they are included in the risk assessment process.
- > Ensure that no colleague repairs, or modifies and equipment or machinery, any colleague that has been identified as doing so will be subject to the company disciplinary procedures.
- > Ensure that manufacturer use and maintenance manuals are available for colleagues to consult with.
- > The Heads of Department, Senior Leadership Team and the Operations Management Teams will ensure that all colleagues who use work equipment have received adequate training for the purposes of their H&S, including training in the methods which may be adopted when using the equipment and any risk and precautions to be taken.
- > Ensure that any dangerous parts of machinery have suitable measures to prevent access to dangerous or rotating parts and that suitable guarding is in place.
- > The Heads of Department, Senior Leadership Team and the Operations Management Team will ensure that any warning signs, sirens or alarms and decals etc are always liable, audible and visible and in good condition.
- > Ensure that work equipment is provided with one or more controls for the purpose of starting to include restarting or after a stoppage or controlling any change in speed, pressure or other operating conditions.

- > Ensure that equipment the Company provides equipment is provided with one or more readily accessible controls the operation which will bring the equipment to a safe condition in a safe manner, and emergency stop controls.

If the equipment you use is faulty, stop using it and report it, do not use 3rd party equipment unless authorised to do so by the Company.

## First Aid

The Company has a duty to implement arrangements to ensure our colleagues receive immediate attention if they are injured or taken ill at work. It does not matter whether the injury or illness is caused by work they do, what is important is that colleagues or any other person receive immediate attention and that when necessary and ambulance is called for more serious cases. First aid can save lives and prevent minor injuries becoming major ones. Therefore, The Company must ensure that adequate first aid provisions and arrangements are in place to manage injuries or illness suffered at work.

The Company will:

- > Dedicate and appointed colleague or colleagues to take charge of first aid arrangement within the company.
- > Ensure a first aid needs assessment is conducted and that this is reviewed frequently considering:
  - The nature of the work and workplace hazards and risks
  - The nature of our workforce/colleagues
  - The company's accident history
  - The size of the organisation
  - The needs of travelling, remote and lone workers
  - Work patterns
  - The distribution of the workforce
  - The remoteness of sites from emergencies and medical services
  - Colleagues working on shared or multi-occupied sites
  - Annual leave and other absences of first aiders and appointed persons
  - First aid provisions for non-employees
- > Ensure there are suitably stocked and readily accessible first aid kits available for the type of work the company undertakes
- > Ensure that there are an appropriate number of suitably trained colleagues to render first aid and enough to cover during times of absence, and that they are refreshed/ trained frequently.
- > Ensure that an appropriate number of mental health first aiders and that they are refreshed frequently.
- > Ensure that colleagues have communicated and understand what first aid arrangements are in place at the SSC or sites they are operating through. company and site-specific inductions.
- > Ensure that appropriate signposting is displayed at the SSC to identify mental health and first aiders. On site first aiders will be communicated through site specific inductions.
- > Ensure the Operations Management Teams liaise and agree when available "tap" into client site first aid arrangements that colleagues can call on in an emergency.
- > Ensure where first aid assistance is not readily available our colleagues will be made aware of the procedure for summoning emergency aid calling 999 or 112 which colleagues from overseas are familiar.

- > Ensure that all accidents are reported to the colleague's direct line manager as soon as possible.

If you do not report an accident, we cannot investigate it and prevent it happening again. Next time it may be more serious, next time it may be a colleague who is hurt.

## Working At Height

The Company has a duty to protect all our colleagues from falls at height as these are a major cause of workplace fatalities and major injuries. Work at height means work in any place where, if there were no precautions in place, a colleague could fall a distance liable to cause personal injury. The Company will take a sensible approach when considering precautions for work at height. The company will control all work at height and ensure that all work is properly planned, supervised and carried out by competent colleagues and service partners for all work at height.

The Company will:

- > Ensure that we consider weather conditions that could compromise colleague safety.
- > Check that the place where the work at height is to be undertaken is safe and that it is checked each time and every time before use.
- > Stop materials or objects from falling, or if it is not reasonably practicable to prevent objects falling, take suitable and sufficient measures to make sure no one can be injured (use exclusion zones etc to keep people away).
- > Store materials or objects so they will not cause injury if they are disturbed,
- > Plan for emergencies and rescue e.g. agree a set procedure for evacuation. Think about foreseeable situations and ensure all colleagues and service partners know the emergency procedures.
- > Select the appropriate equipment for all work at height considering weather, nature, frequency, duration and risks to the safety of everyone where the work equipment will be used.
- > Ensure the work equipment is serviced, maintained and inspected at suitable intervals appropriate to the work equipment.
- > Keep detailed records of all work equipment maintenance, servicing and inspections.
- > Ensure that colleagues take reasonable care of themselves and others and that they co-operate with The Company to enable them to fulfil their H&S duties.
- > Ensure that only “competent” colleagues and service partners are engaged in any activity including the organisation, planning and supervision in relation to any work at height or work equipment for use.
- > Ensure that every colleague or service partner reports any activity or defect relating to working at height which he knows is likely to endanger the safety of himself or another person is reported immediately.
- > Ensure that colleagues and service partners use any work equipment or safety device provided to them for work at height in accordance with their training and instructions provided to them regarding any requirements or prohibitions imposed to enable The Company to meet our obligations.

## Fire Management

The company has responsibilities placed upon it under the Regulatory Reform (Fire Safety Order) and as such will comply with the requirements of the order and subordinate legislation enacted under it.

The Company will ensure that a suitable risk assessment is carried out to ensure that all significant hazards are identified, and suitable control measures are implemented to reduce the level of risk to an acceptable level.

The Company will:

- > Appoint a “Responsible Person” that have specific duties to ensure The Company is complying with its legislative requirements.
- > Ensure that a suitable and sufficient “fire” risk assessment is completed by a competent person or organisation which is reviewed frequently, of after any fire related incident, enforcing authority intervention or legislative change.
- > Provide all our colleagues with clear and relevant information on the risk to them identified by the risk assessment, and the control measures that are in place to prevent fires, and how these measures will protect them at the SSC.
- > Ensure that site-based colleagues have relevant fire safety information for the site(s) that they operate from covered during site specific induction(s) by The Operations Management Team.
- > Communicate to non-employees the relevant risks to them and provide them with information about who are the nominated competent persons and about the fire safety procedures.
- > Ensure that site-based teams and mobile colleagues co-operate with other responsible persons who are in control of those premises i.e., clients and inform them of any significant risks they find and how The Company will reduce / control those risks which may affect safety of their colleagues, tenants and visitors etc
- > Ensure if a young person has been employed that the colleagues’ parents have been provided with clear and relevant information on the risks to that young person and what measures are in place to prevent / protect them from fire and inform any other responsible person.
- > Provide the employer of any person from an outside organisation who is working at the SSC with clear and relevant information on the risks to those employees and the preventative measures taken. The Company will also provide those employees with appropriate instructions and relevant information about the risks to them.
- > Consider the presence of any dangerous substances and the risk this presents to relevant persons from fire.

- > Establish as suitable means of contacting the emergency services and provide them with any relevant information about dangerous substances.
- > Provide appropriate information, instruction and training to our colleagues, during normal working hours, about the fire precautions at the SSC and on client sites when colleagues start working for the company and refresh it frequently.
- > Ensure that all firefighting equipment is clearly signposted, regularly inspected and serviced by a competent service engineer.
- > Ensure that daily fire inspections are conducted to ensure that all fire exits and signs are maintained in a suitable condition, clear and unobstructed. On client sites this is managed by the client building management teams.
- > Ensure at the SSC that the means for detecting a fire are maintained and serviced by a competent service engineer, monitored and linked to an external monitoring station.
- > Ensure that all emergency lighting, escape routes and final exit doors and mechanisms are appropriate to facilitate a safe exit from the premises.
- > Ensure that routine fire practices are conducted at the SSC approximately at 6 monthly intervals or after any fire related incident, poor fire practice, change in escape routes, during any building alterations, large changeover of colleagues or legislative change.
- > Fire practices on client sites are mandated by the client building management team, all site-based colleagues will be undertaking fire practices according to the client frequency plan.
- > Ensure that the fire alarm system at the SSC is tested on a weekly basis which is recorded.
- > Ensure that there are sufficient colleagues to assist with the evacuation of colleagues and persons that require special assistance in the event of any emergency.

## Training & Competence

The Company has a duty to ensure every colleague that works for it must know how to work safely and without risk to their health and safety. Therefore, The Company will ensure all colleagues are given clear instructions and information as well as adequate training and supervision. Colleagues with training needs such as new colleagues or colleagues changing jobs or taking on extra responsibilities etc will be provided with additional support and training as necessary. Therefore, to meet our duty:

The Company will:

- > Decide what training and information we need to provide and deliver for our work activities.
- > Ensure that the colleagues have the relevant information on the hazards, the risks, measures in place and how to follow any emergency procedures.
- > Ensure that colleagues involved are consulted to ensure that training is relevant and effective.
- > Ensure that all training records are retained to aid the decision when refresher training is needed.
- > Ensure that training information is easy to understand and that colleagues know what is expected of them.
- > Ensure that colleagues receive training during working hours and that it is free.
- > Provide additional training and support for colleagues that are working with new equipment or if there is a change to working practices.
- > Include colleagues with needs such as colleagues who are particularly vulnerable to accidents etc.
- > Provide training that develops a positive H&S culture and meets our legislative obligations.
- > Provide training that contributes towards making colleagues competent in H&S.
- > Ensure that colleagues at whichever level or role they undertake are suitably trained to fulfil that position.
- > Will set a clear set of training priorities and the frequency that refresher training is to be completed in accordance with legislative requirements, industry standards and best practice.
- > Review all training to ensure that it is effective and has worked.
- > Ensure that competent colleagues guide and can structure training that have the correct competencies to advise The Company.

In house training delivery will have no minimum or maximum time allocated to specific training relating to the operation or task. The complexity of the task and hazards involved will dictate the training required. The conclusion of all training will involve the in-house trainer validating that the colleague is competent to carry out the task. Part of that competency must be the confirmation from the colleague that all operating procedures have been fully understood.

## Accident, Incident, Near Miss Reporting & Investigation

The Company is committed to reducing the number of accidents, incidents and preventing ill-health. The Company will investigate all accidents, incidents and serious near misses as necessary and where applicable instigate control measures to prevent a re-occurrence. All colleagues are encouraged to report accidents, incidents and near misses as this aids the company identify patterns in accidents and incidents so we can better manage risk in our workplace.

The Company encourages all colleagues to report all adverse events to ensure that we meet our legislative obligations but to also:

- > Improve Safety Performance: it identified where and how risk arise allowing for investigations of serious incidents and the implementation of measures to prevent future incidents.
- > Provide protection for colleagues and The Company.
- > Foster a positive safely culture, build trust so colleagues can report without fear of blame and demonstrate we take safety seriously and that we value our colleague's wellbeing.

The Company defines "Adverse events" as:

- > An "Accident" is an incident which results in injury to someone or damage to property.
- > An "Incident" could be described as an undesired event that has caused or could have caused damage, fatality, injury or ill-health
- > A "Near Miss" could be described as an incident that results in no injury or damage, but which had the potential to.

It is the expectation of The Company that colleagues will report all accidents, incidents and near misses as soon as possible through the following sources:

- > Their direct, supervisor, team leader, site manager and The Operations Management Team etc. verbally if they have not immediate access to the company reporting platform.
- > Via the hard paper copy that is contained in each site-specific file.
- > Through Templar Mobile for those colleagues that have access to the system.
- > Through the Facility App platform which can be accessed through the QR Code
- > Through the Facility App web-based platform

The Company will report and record all adverse events that include but not limited to:

- > All accidents and incidents whether they result in harm, injury, property and equipment damage or not.
- > Dangerous Occurrences
- > Non-fatal accidents to any person other than colleagues
- > Over-3-day incapacitation of a colleague
- > Over-7-day incapacitation of a colleague
- > Occupational Diseases and Cancers
- > A fatality of any colleague or person
- > A colleague that has sustained a specified injury as highlighted in Regulation 4 of Regulation of Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR)

The ESG department will monitor all adverse events and report safety performance to all relevant colleagues through the under mentioned media:

- > Weekly via email to the Senior Leadership Team inclusive of the H&S Team, Head of People Relations and the Executive via the Chief Operations Officer (COO)
- > Monthly to the COO for inclusion on the “Executive Scorecard”
- > Annually through the Management Review process provided to the Executive detailing the company safety performance for the year.

All adverse event reports will be retained by The Company for:

- > a minimum of 3 years from the date of the adverse event report
- > In the case of an Occupational Disease up to 40 years
- > Health and medical records (health surveillance) 40 years
- > In accordance with current legislative requirements.

If an adverse event requires reporting to the Enforcing Authorities, this will be managed by the ESG Department through the RIDDOR reporting system. These regulations require the reporting of specified accidents, ill health and dangerous occurrences to the enforcing authorities, these include:

- > Fatality
- > Major injury defined as:

(a) any bone fracture diagnosed by a registered medical practitioner, other than to a finger, thumb or toe.

(b) amputation of an arm, hand, finger, thumb, leg, foot or toe.

(c) any injury diagnosed by a registered medical practitioner as being likely to cause permanent blinding or reduction in sight in one or both eyes.

(d) any crush injury to the head or torso causing damage to the brain or internal organs in the chest or abdomen.

(e) any burn injury (including scalding) which:

(i) covers more than 10% of the whole body's total surface area; or

(ii) causes significant damage to the eyes, respiratory system or other vital organs.

(f) any degree of scalping requiring hospital treatment.

(g) loss of consciousness caused by head injury or asphyxia; or

(h) any other injury arising from working in an enclosed space which—

(i) leads to hypothermia or heat-induced illness; or

(ii) requires resuscitation or admittance to hospital for more than 24 hours,

The ESG department will investigate adverse incidents to:

- > Collect information that The Company will need to pass on to the enforcing authority
- > Identify the cause of the incident to stop it happening again
- > Gather information needed for a potential insurance claim
- > To find out the cost of the incident
- > Identify other hazards and risks or training requirements
- > Ensure legal compliance
- > Make the workplace safer
- > Prevent further business losses from disruption and downtime

The size and composition of any investigation team that is assigned to investigate will be dictated by the Head of ESG / HS&Q Manager or a nominated colleague in their absence but may consist of or mixture of:

- > A colleague familiar with the work location (SSC or client site)
- > The colleague involved in the incident (if possible)
- > A supervisor or site manager from the workplace (SSC or client site)
- > A colleague representative (if applicable)
- > A technical expert (if necessary)
- > A member of the H&S Team (advisor or manager)
- > A Senior Manager with authority and influence

The investigation will be determined by the nature of the incident and may involve all the above or selected colleagues which will all be determined by the likelihood of recurrence and the potential worst consequences of the undesired event.

## Alcohol & Drugs

The Company has a duty to protect colleagues health and safety therefore we all must understand the signs of drug and alcohol misuse (or abuse) as this will aid the company manage the health and safety risks in our workplace. Misuse is not the same as dependence. Drug and alcohol misuse is the use of illegal drugs and misuse of alcohol, medicines and substances such as solvents.

All managers and colleagues should be aware of the warning signs which could indicate drug or alcohol misuse these include:

- > Unexplained or frequent absences
- > A change in behaviour
- > Unexplained dips in productivity
- > More accidents or near misses
- > Performance or conduct issues

The company will consult colleagues on H&S matters this is also covered in People Relation Policies and Procedures. The Heads of Department, Senior Leadership Team and The Operations Management Team must consider the work they are responsible for managing and the kind of work which may have safety critical elements where drug or alcohol misuse could have a serious outcome such as:

- > Colleagues using machinery
- > Using electrical equipment of ladders
- > Driving or operating lift equipment etc

Where colleagues in safety critical roles seek help Heads of Department, Senior Leadership Team and The Operations Management Team may require transferring them to other work at least temporarily, this will be guided by People Relations and ESG Department. Any requests for screening will be managed through People Relations. The Heads of Department, Senior Leadership Team and The Operations Management Team must ensure that all colleagues in a managerial role have received training and awareness to aid them:

- > Recognise the signs of drug and alcohol misuse
- > The Company's policy and rules on drug and alcohol misuse
- > What to do when a colleague tells them about a drug or alcohol problem.

Heads of Department, Senior Leadership Team and The Operations Management Teams must ensure that they know the company Drugs and Alcohol policy and ensure that no colleague is placed at risk of causing harm to themselves or others when drug and alcohol misuse has been identified or reported.

## Workplace Health, Safety & Welfare

The Company has a duty to ensure so far as reasonably practicable, the health, safety and welfare of all our colleagues at work. At the SSC we also have a responsibility towards people not in our employ to protect their health, safety and welfare.

The Company will be at the SSC:

- > Ensuring that equipment, devices and systems which apply are maintained (including cleaning as appropriate) and in an efficient state in efficient working order and in good repair.
- > Ensure that any faults or defects are rectified as soon as possible and immediately isolate any fault if there is a risk of serious or imminent harm.
- > Ensure that the frequency or regular maintenance is in accordance with the manufacturer's instructions, best practice and legislative requirements.
- > Ensure effective and suitable provisions are made to ensure that the SSC is ventilated by sufficient fresh or purified air.
- > Ensure that mechanical ventilation is regularly and adequately cleaned and tested.
- > During working hours, the temperature is reasonable and not exposed to uncomfortable drafts.
- > Provide suitable means to regulate temperature by providing thermostats or means to raise or lower temperatures.
- > Protect colleagues from solar radiation by providing internal blinds which are maintained and cleaned frequently.
- > Ensure that there is suitable and sufficient lighting and when reasonably practicable by provided by natural light.
- > Ensure that workplace lighting provided in any part of the SSC enables colleagues to work, use facilities, and safely move from place to place.
- > When necessary, provide colleagues with "task lighting"
- > Ensure the premises are cleaned frequently to ensure light can enter the building.
- > That furniture, furnishings and fittings therein shall be kept sufficiently clean.
- > So far as reasonably practicable remove waste materials and not accumulate in the building or on site.
- > Ensure that all surfaces of floors, walls and ceilings are maintained and treated, repaired and cleaned properly.
- > Ensure that cleaning is carried out by an effective and suitable method without creating or exposing any person to an H&S risk.
- > Ensure that colleagues at the SSC have sufficient floor area, height and unoccupied space for the purpose of health, safety and welfare.
- > Ensure that every workstation is so arranged that it is suitable both for any colleague at work in the workplace who is likely to work at that workstation and for any other work they will likely be undertaking.
- > Ensure that every floor in the workplace and the surface of every traffic route is so constructed that the floor or surface of the traffic route is suitable for that purpose.

- > Ensure that no window used to ventilate shall be in a position when open which is likely to expose any colleague or person to a risk to their H&S.
- > Ensure that the SSC is organized in such a way that pedestrians and vehicles can circulate in a safe manner, on client sites this responsibility is theirs.
- > Ensure that suitable and sufficient sanitary conveniences are provided at readily accessible places.
- > Ensure that suitable and sufficient washing facilities, including showers if required by the nature of the work or for health reasons, are provided at readily available places.
- > Ensure that sufficient toilet and washing facilities are provided to allow people to use them without unreasonable delay.
- > Ensure that an adequate supply of wholesome drinking water is provided for all people in the workplace.
- > Ensure that suitable and sufficient accommodation is not worn during working hours or for special clothing worn during work and not taken home.
- > Ensure that suitable and sufficient rest facilities are provided to eat meals, with an adequate number of tables and chairs etc.

## Control Of Contractors

The Company defines a “Service Partner” as anyone or organisation that undertakes work for Regular Cleaning, but who is not an employee. The work they may deliver would include maintenance, repairs, installation, construction, material and equipment supply and training etc. All Service Partners must meet the requirements of this policy, The Company does not require them to adopt this policy, however we do require all service partners to have procedures and arrangements in place that reflects the hazards encountered in their operations.

The Company and Service Partners must co-operate with each other to ensure that all relevant statutory requirements and controls are implemented, monitored and effective.

The Company “Approved Supplier” Policy will:

- > Ensure that Service Partners understand they must always work safely and that they owe responsibility to Regular Cleaning to do so.
- > Ensure that the policy is provided to service partners and that it is reviewed frequently.
- > Maintain an “Approved Supplier” list managed by the HS&Q Manager which is audited frequently.
- > Ensure that annual due diligence checks are completed by the ESG Department and that any service partner that does not meet the requirements is removed / suspended from the approved service provider lists, until such time as they do meet the requirements.
- > Ensure that colleagues know their responsibilities for managing service partners
- > Ensure that service partners have safe working procedures and site rules, and colleagues have been made aware of them prior to any task being undertaken.
- > Ensure that appropriate monitoring is conducted on all service partners to ensure that all service partners are working safely always.
- > To ensure that service partner colleagues are competent to undertake the work tasks that have been agreed.
- > Ensure that service partners complete frequent risk assessment and safe systems of work reviews.
- > Ensure that the lines of communication are clear and robust.
- > Ensure that the process of raising concerns and addressing performance is known and accepted.
- > Ensure that any Permit to Work systems are known, monitored, adhered to and audited whether at the SSC or through a client portal.
- > Ensure that a robust service partner “Onboarding” process is in place to ensure due diligence checks are conducted and reviewed frequently by the ESG and other departments.

## Permits To Work

The Company has adequate instructions and procedures for most of our work activities, but some require extra care. A “Permit to Work” is a more formal system that states exactly what work is to be done and when, and which parts are safe. The Company will ensure that a responsible person assesses the work and checks safety at each stage. The colleagues doing the work will sign the permit to show that they understand the risks and precautions necessary. The Company will emphasize that the “permit to work” system is not a replacement for robust risk assessment but helps bring that risk assessment to life. To ensure the permit-to-work systems function correctly:

The Company will:

- > Emphasize to all Heads of Departments, Senior Leadership Team, Operational Teams and service partners that the permit does not by itself make a job safe.
- > Ensure that Roles and Responsibilities is clear highlight who is in charge and who does what, ensuring there are no gaps or overlaps.
- > Ensure that if the “job” cannot be finished in one shift, ensure that it will be left in a safe state and that clear instructions are given to the next person or colleague through the handover process.
- > Ensure that all relevant information including hazards and controls to all persons involved.
- > Ensure that all colleagues that issue permits are appropriately trained ensuring they have all relevant information.
- > Ensure that permit to work systems are included in the risk assessment and method statement process.
- > Ensure that all colleagues that are subject to client permit to work portals fully understand their responsibilities and that they have been provided with suitable, information, instruction and supervision to do so.
- > Ensure that all Regular Cleaning and Service Partner colleagues know client permit to work requirements and that these are always followed.
- > Ensure that the ESG department keeps a record of all permits raised and issued at the SSC and that these are audited frequently.

## Workplace Transport

The Company classifies workplace transport as any vehicle or piece of mobile equipment used in any work setting. It incorporates a wide range of vehicles from cars, vans, lorries and lift trucks. Vehicles moving on public roads are classed as “workplace transport” because road traffic laws cover any associated risk in more detail than general H&S law. The Company will comply with its legal obligations as detailed in the Road Traffic Act. To fulfil this requirement:

The Company will:

- > Ensure that every workplace that Regular Cleaning operates in is safe for any colleagues and vehicles that use it so they can move around safely.
- > Ensure that pedestrians and vehicles can use a traffic route without causing danger to H&S of people working near it.
- > Ensure that colleagues and service partners have clearly displayed appropriate markings and signs where necessary for H&S reasons.
- > Ensure, when necessary, make reasonable adjustments to ensure any disabled person is not being placed at a disadvantage to non-disabled colleagues in the workplace.
- > Ensure that there is segregation of pedestrians from vehicles and that colleagues know the traffic route site specific safety rules which are covered during inductions and refreshed frequently.
- > Ensure that members of the public are segregated from work activities as they are unlikely to be familiar with workplace hazards.
- > Ensure that all company vehicles comply with all speed restrictions and limits on site and on public roads.
- > Ensure that suitable lighting is made available at the SSC to illuminate all traffic and pedestrian routes.
- > Ensure that when required “banksmen” are used and that they are always visible to prevent accidents from reversing risks.
- > Ensure that colleagues that require it have received suitable banksman training.
- > Ensure that parking at the SSC is safe and that suitable parking spaces are available, access vehicles will be prevented from parking at the SSC and will have to find alternative parking off site.
- > Ensure that all nominated drivers know the incident reporting procedure and emergency response numbers.
- > Ensure that before any visiting driver arrives, they are made aware of any site-specific traffic restrictions.
- > Ensure that a vehicle operated by colleagues are not loaded beyond its “rated capacity” and can take the weight.
- > Ensure that workplace transport is maintained and inspected at suitable intervals in accordance with the manufacturer’s recommendations and legislative requirements.
- > Provide suitable and sufficient training to all drivers with refresher training or after any incident, accident and serious near miss.
- > Ensure that colleagues provided with company vehicles understand they are required to inform The Company of any vehicle licence penalties or restrictions (bans etc) immediately.
- > Ensure that nominated drivers are subject to vehicle licence checks annually.

- > Ensure that a workplace transport risk assessment is conducted and reviewed frequently ensuring that colleagues are consulted.
- > Ensure that nominated drivers conduct daily pre-use vehicle inspections (lights, tyres, engine oils and lubricants etc) and report any faults immediately.
- > Ensure that quarterly vehicle inspections are conducted, and the requisite quarterly check sheet is submitted to “fleet”, so wear and tear is monitored appropriately.
- > Ensure that all nominated drivers submit vehicle mileage and fuel usage on the last working day of every month to the ESG Department.

## Health & Safety Performance Monitoring

The Company understands that good quality monitoring will not just identify problems but will aid the understanding of what may have caused them and what sort of changes are needed to address them. The Company realises that monitoring takes time and will need appropriate resources and a need to train colleagues appropriately to support performance monitoring. The Company categorises monitoring as:

- > Active: which include, routine inspections of premises plant and equipment, health surveillance, maintenance and servicing etc
- > Reactive: investigating accident and incidents, monitoring cases of ill-health and sickness absence records etc

The Company will implement some key actions to effectively monitor safety performance these are as follows:

The Executive must:

- > Demonstrate commitment to performance management and continuous improvement
- > Ensure that reporting systems are in place to report performance upward, to ensure legal compliance is achieved and maintained.
- > Ensure that a process is in place to report serious incidents immediately.
- > Receive and review performance reports at frequent intervals.
- > Question the results and ensure that action is taken to tackle poor performance

Heads of Department / Senior Leadership Team will:

- > Think about who will monitor what, this will involve different levels within the management chain
- > Decide how often monitoring will take place ensuring it is proportionate, considers our risk profile and monitors key risk and precautions.
- > Ensure that the frequency of monitoring and inspections is determined by our policies and procedures and legislative requirements.
- > Plan what actions will be taken if performance goes up or down
- > Use performance measurements to improve H&S performance, learn from organisational failures and share lessons throughout the company.
- > Review organisational performance against the H&S policy and procedures annually
- > Consult colleagues and get them involved in setting monitoring H&S performance, to ensure all colleagues are involved.

The Company will monitor H&S performance through a series of measures highlighted below; however, Heads of Department and the Senior Leadership Team should consider departmental specific measures in addition to the standard company monitoring framework includes but not limited to.

- > Weekly accident and incident update provided by ESG to the Senior Leadership Team.
- > Monthly Executive ESG Performance output provided to the Chief Operations Officer

- > Monthly Senior Operations ESG Performance output provided during monthly senior operations meetings.
- > Monthly ESG-People Relations Sickness Absence Meetings to review trends and current risks
- > Monthly through the company Gazette which is communicated through the colleague Regular Reward portal.
- > 6 Monthly ISO 45001 audits completed via British Standards Institute
- > Routine H&S audits completed by the H&S Advisors (at least 50 per year)
- > Colleague annual H&S training refreshers (100% to be achieved by end of March each year)

## Management Reviews

The Company will conduct annual HSMS reviews to whether the H&S arrangements remain valid and that they are effective. We will as part of the review determine how the H&S environment across the company has changed, or to stop doing things that are no longer necessary while enabling us to respond to new risks. Conducting reviews also provides an opportunity to celebrate and promote our H&S successes. The most important aspect of The Company conducting a review is that it closes the loop and provides real data to form what we will do next with H&S.

The Company will implement some key measures in reviewing safety performance these are as follows:

The Executive must:

- > Consider the review findings, if improvement is needed, they should act appropriately.
- > Ensure the review is carried out according to the H&S plan and that findings are provided to the Executive annually.
- > Ensure that the scope of the review is carried out according to the H&S plan and issued to the Senior Leadership Team.
- > Ensure that the scope of the review will give assurance that risks are as low as reasonably practicable and that we are complying with the law.

Heads of Department / Senior Leadership Team will:

- > Make judgements about the adequacy of H&S performance in their area of responsibility
- > Make a judgement that the system for managing H&S in their area of responsibility is working.
- > Ensure that they are complying with legislative requirements
- > Ensure they are setting the standards all colleagues must comply with in their area of responsibility.
- > Continually improve H&S performance
- > Ensure that they respond to change and learn from experiences and best practices

The type of information will be collected:

- > Active monitoring (before things go wrong)
- > Reactive monitoring (after things go wrong)
- > Accident/incident and near miss data
- > Training records
- > Inspection reports
- > Investigation reports
- > Risk assessments
- > Issues raised by colleagues through colleague's surveys, make a difference days, town halls etc
- > Legislative checks such as lifting equipment etc



Management reviews will be carried out annually and form part of the management review process with support strategic planning, ISO certification and resource planning to address risks and improve H&S performance.

# Regular Cleaning Company Structure



**Key:**

- Colleagues
- Senior Leadership Team
- Executive Team

