Outcomes First Group

Group Health & Safety Policy

Health & Safety



Outcomes First Group

GROUP HEALTH & SAFETY POLICY

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1.0 PURPOSE

OFG's vision is to build incredible futures by empowering vulnerable children, young people and adults in the UK to be happy and make their way in the world.

We want OFG to be a place where all our employees love to work and make a real difference for the people we support.

This policy supports this by outlining the minimum health and safety requirements and control measures to be implemented, providing a framework to make sure an effective and appropriate safety management system is adopted across OFG sites.

2.0 SCOPE

- This policy applies to all OFG employees, non-employees and workplaces.
- This policy may be amended at any time.
- This policy will be reviewed at least annually to ensure that it reflects our legal obligations and OFG's organisational and business needs.

3.0 OUR COMMITMENT AND POLICY STATEMENT PRINCIPLES

OFG are committed to protecting the health and safety of our employees, people we support, visitors and all other people affected by our activities.

The Chief Executive Officer on behalf of the OFG Board and Executive Teams reviews and signs an annual Health and Safety Policy Statement that applies to all OFG locations, employees, and non-employees who do work for us.

As well as being displayed at OFG premises, it is brought to the attention of all employees when they join the business as it confirms our wholehearted commitment to the high standards set out in our Health and Safety Policies. We are intent on instilling a culture of continuous improvement to make sure that this policy 'lives and breathes' across OFG.

4.0 SPECIFIC HEALTH AND SAFETY TOPICS

HS1 ACCIDENTS, NEAR MISSES AND DANGEROUS OCCURRENCES

All injury accidents, however minor, will be reported and recorded on the Group's management information systems for future reference and to comply with specific legislation – these are:

- Info Exchange (for all staff, visitor and contractor)
- Sleuth (for all people we support in Education settings)
- Access (for all people we support in Care)

Accidents with injury, and near misses that could have led to serious harm, or a reportable dangerous occurrence, will be investigated at site level to determine the causes, and any actions necessary to prevent a recurrence. The depth of the investigation will be determined by the severity and potential of the accident.

Where the accident caused injury to employees or others as categorised under the Reporting of Injuries, Diseases and Dangerous Occurrence Regulations (RIDDOR), these will be report under the legally specified timescales to the Health and Safety Executive (HSE), either online or by telephone for specified serious and fatal injuries. Guidance on reporting accidents to the enforcing authorities is provided by the Health and Safety Department on SharePoint and is freely available from the HSE on their website.
The significant findings of accident investigations will be fed back into the risk assessment process so that policy, procedures and control measures can be evaluated for their effectiveness and where necessary revised. Where necessary investigations will be escalated to senior management.

Statistical information and trends will be reviewed and reported on a regular basis with targets set where identified to reduce accident rates. All employees have a responsibility to report any accidents to their line manager so that appropriate action can be taken. Where witness statements are required they should be taken as soon after the event as possible and all employees are expected to co-operate with this procedure.

The late reporting of accidents is unacceptable and a breach of this policy. Such breaches should be reviewed with the employee by their line manager. Where photographs are taken to assist with the investigation, care should be exercised to ensure GDPR and associated policies are not breached.

A detailed 'Accident, Incident and Dangerous Occurrence Reporting Policy' is available on the OFG communications platform 'SharePoint'.

HS2 ASBESTOS

Asbestos is recognised as being a substance that can cause serious and significant long term or permanent damage to health. OFG has a specific detailed policy for asbestos, and structured asbestos management plan templates. This documentation is available on SharePoint – OFG Resources.

HS3 EMPLOYEE CONSULTATION

The Health and Safety (Consultation with Employee) Regulations 1996 requires all employers to consult with employees. Consulting employees on health and safety can result in healthier and safer workplaces.

As well as helping to embed processes and actions, our people have a great deal of practical experience and knowledge which, when taken into account, can help with improved decision making around health and safety. At site level, quarterly Health and Safety meetings are our main consultation method to ensure matters regarding health and safety affecting the health, safety and welfare of all employees are discussed and communicated. Minutes will be produced of all health and safety meetings and circulated to all members present for onwards communication to relevant stakeholders and copies will be retained. Where necessary concerns will be escalated to senior management and / or the Head of Health and Safety.

We are committed to a partnership approach to risk management by involving all managers and employees. In particular we will consult with employees regarding changes at the workplace that may substantially affect their health and safety. Consultation will also take place where necessary where there are changes in systems of work; with regard to the arrangements for competent advice on health and safety matters; the planning and organising of health and safety training; and the health and safety consequences of introducing new technology, working patterns and significant changes in working hours.

Within OFG there are also a number of other options available to employees to raise any concern they may have regarding their health, safety and welfare. In the first instance it is preferable that the employee raises any immediate concerns with their line manager. Non-urgent matters can be raised via the health and safety committee or through the various People policies protecting and supporting employees under the general terms and conditions of employment. The Whistleblowing Policy is available as a last resort after other options have been explored.

A Site H&S Committee Meeting template is available on our OFG Resources page on SharePoint to support a consistent approach to employee consultation.

HS4 CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH)

During our daily activities OFG locations use limited quantities of hazardous and dangerous substances including cleaning and laundry products, personal hygiene products, paints, glues, solvents, sealants and fuels. Sites may also undertake activities that generate hazardous and dangerous substances such as harmful micro-organisms from soiled laundry, or dust.

All products used that contain hazardous and dangerous substances are to be listed on a substance inventory and a current safety data sheet obtained from the supplier. Some dangerous substances are created from micro-organisms, or are naturally occurring which do not have chemical safety data sheets.

Within some services, employees may be involved in the cleaning up of body fluids. These too are deemed as potentially hazardous and the procedures used to remove these require a risk assessment.

Each OFG site will carry out risk assessments on the use and handling of hazardous substances which may include the preparation, transport and use of pharmaceutical agents, and the clearing of body fluid, to assess the potential exposure and identify risk and infection control measures to minimise exposure. The people we support are to be involved in the risk assessment process where applicable and meaningful to them.

Risk assessments must be undertaken before the introduction of a new activity or substance that could result in the generation of, or exposure to a hazardous substance. The risk assessment's control measures will be made easily available to employees in department specific COSHH folders, especially for activities such as Domestic Stores, Laundry, Maintenance, Kitchen, Science Classrooms, Woodworking Classrooms and Worksop's. When storing hazardous and dangerous substances, the storage area will be secured, suitable and only compatible substances are stored together.

Staff must not bring substances to site unless approved for use by the Registered Manager / Principal / Head Teacher / Office Manager. It is OFG policy that bleach is prohibited at all locations.

Substances must not be decanted into other containers that are not intended for dilution or for that product, particularly any containers originally used for food and drink. All containers must be clearly labelled identifying the contents and dilution strength.

Substances must always be stored in locked cupboards away from direct sunlight with the exception of personal hygiene products. Substances must not be decanted into other containers that are not intended for dilution or by that product, particularly any containers originally used for food and drink. All containers must be clearly labelled identifying the contents and dilution strength.

Where significant quantities of flammable substances such as Fuel, Oil and LPG are used they are stored in specifically designated external storage areas which include proper ventilation and warning signs. An appropriate number of nominated employees must be trained in the emergency procedures to be followed in the event of a leak or spillage.

Substances that are locked in storage areas will only be accessible to authorised employees trained in their safe use. Employees must be reminded of the need for good personal hygiene and are prohibited from eating, drinking or smoking when using substances or handling soiled laundry. Staff are to be provided with all the necessary personal protective equipment and the instructions for its use, maintenance, storage and replacement. The correct use and storage of hazardous and dangerous substances should constantly be monitored. COSHH training is mandatory for employees that use or come into contact with hazardous substances and should be refreshed every 3 years or when new substances are introduced. All substances surplus to requirements and clinical waste are to be disposed of via licensed waste contractors.

Within education, the teaching of science often includes the use of chemicals and substances which must be stored and handled with care. OFG has a corporate membership to CLEAPSS. This is a service which

provides health and safety advice and training supporting practical work in science, design technology and more recently art and design in schools. It is OFG Policy for all science departments to utilise CLEAPSS.

As part of induction training for identified appropriate staff groups, new staff will receive training for COSHH. Local training by the Line manager will identify local arrangements including storage, First Aid arrangements and locations of COSHH folder(s). For staff groups working with classified hazardous products, managers must ensure that staff receive appropriate training for the safe use of that product.

Refresher training must be completed within a three-year period from initial induction and repeated at three yearly intervals thereafter.

HS5 DISPLAY SCREEN EQUIPMEMT (DSE)

The Health and Safety (Display Screen Equipment) Regulations apply to workers who use DSE daily, for continuous periods of an hour or more. These workers are considered 'DSE users'. The regulations don't apply to workers who use DSE infrequently or only use it for a short time.

A workstation includes the screen, keyboard, and other parts of the computer and its accessories such as the mouse, the desk, chair and the immediate work environment. Specific regulations apply for all employees who habitually use display screen equipment as part of their work; this includes any employees who work from home (home workers). All employees (users) which these regulations apply to must complete a workstation self-assessment as part of the e-learning training module.

OFG will provide training and information on the safe use of the workstation and equipment for all employees

who use display screen equipment as part of their role. Refresher training should be repeated a minimum of every three years. Any risks that are identified by the employee should be highlighted to their line manager where they can then be remedied as soon as practicable. Where any issues cannot be easily resolved by the line manager or a 'like for like' replacement or repair of a keyboard, mouse, screen or chair etc, support and guidance is provided by the health and safety department. Where medical or ill health complications exist, both Occupational Health and Health and Safety may need to be involved to help resolve. A formal occupational health or Ergonomic assessment should only be made following consultation with HR. The workstation risk assessments will remain valid and only need to be reviewed if there has been a significant change to the workstation, e.g. bigger screen and associated equipment or changes to the employee's capabilities, change in location from office to home, a health complication arises or after a period of three years. Employees must ensure that their daily work using display screen equipment incorporates breaks away from the equipment; this can include carrying out different types of work activity.

All workstations used by employees will meet specified minimum requirements as detailed in the approved code of practice published by the Health and Safety Executive. Any workstation that does not meet the specified minimum requirement will be modified to ensure compliance. Employees working from 'hot desks' do not need to complete a fresh risk assessment each time they move location and work at a different desk; however, it is important that prior to commencing work the workstation and chair is adjusted by the employee to suit their needs as per the e-learning.

All employees defined as a 'user' are entitled to an "appropriate eye and eyesight test" which is funded by OFG. Where it is found that an employee requires the use of special corrective eyewear specifically for use with display screen equipment, OFG will be liable for the cost of basic eyewear which is suitable for what the employee requires. The amount of contribution is subject to review by the HR function. No contribution will be provided for glasses where they are for general use, driving or reading. Claims should be accompanied by appropriate written evidence signed by a qualified Optician. Refer to the HR Policy or contact the HR Operations team for more information.

Not all glasses are supplied free of charge. If the 'user' already wears glasses and these are adequate for normal work, including work with DSE, there is no duty for the employer to pay for or towards glasses.

Please note: The terms Visual Display Unit (VDU) and Display Screen Equipment (DSE) are interchangeable. DSE is the current reference. See SharePoint for more information and guidance on safe ways of working, posture tips and health and wellbeing support.

HS6 ELECTRICAL SAFETY

Electricity is recognised as a potential hazard with high risks that can prove to be fatal. No employee is permitted to work on electrical items unless they are trained and authorised and have the appropriate controls and documentation to allow them to do so. No privately-owned mains-powered electrical items should be brought into the workplace for use at work or during work unless agreed and authorised by line management as being appropriate, justified and inspected in accordance with regulations relating to portable appliances prior to use. In many office locations, USB ports have been installed and integrated with normal charging points. Charging/data cables are permitted for use as long as these are free from obvious defect and from a reputable supplier. Portable appliances should not be left on-charge and unattended.

All fixed electrical systems at OFG locations will be checked on a five-year basis (3 years in Wales). All portable electrical appliances will be checked and maintained as appropriate for that type of equipment, commonly known as PAT (portable appliance testing), on an annual basis.

Simple electrical work such as changing of bulbs and fuses will only be permitted where the person has been instructed and authorised to do so – in all cases the activity should have been risk assessed first and appropriate controls implemented and trained to the employee.

Due to the high risk of electricity OFG have a specific Electrical Safety Policy which is available on OFG Resources Health & Safety page

HS7 FIRE SAFETY

OFG understands the importance that fire safety has across the organisation and its responsibilities under fire safety legislation. We will ensure that each site is provided with a fire risk assessment. The assessments

will be completed by designated competent persons or third parties external to the organisation and will identify the general fire precautions that are required to be taken to meet legislative requirements. It is OFG policy that a full fire risk assessment is carried out every 3 years, or sooner if the assessment(s) are no longer considered valid or significant changes have occurred. In addition, all fire risk assessments must be reviewed annually at site level.

It is OFG's aim to ensure that all potential fire risks are eliminated. Where this is not possible, controls will be implemented to reduce these risks to a minimum. In doing so, we will provide in all premises under our control:

- adequate fire detection and warning systems;
- suitable and sufficient fire-fighting equipment;
- comprehensive evacuation procedures;
- adequate means of escape including clear signage and assembly point;
- and information and training to all employees on fire safety.

We will make sure that each function and workplace under our control has an appropriate fire procedure and that this is communicated to employees, people we support, visitors, contractors and members of the public. Practice fire drills will take place at locations and each employee must take part in drills and evacuations at a minimum frequency as stipulated in the fire policy and relevant standard operating procedures. Each site will make sure that suitable systems and contracts are in place to ensure the maintenance and integrity of all fire safety precautions.

We are committed to providing all employees with adequate fire safety training as part of their induction and refresher training at suitable periods as determined by the risk assessment and the relevant standard operating procedures. Where functions share premises with other 'responsible persons' (i.e. another employer) we endeavour to co-operate and co-ordinate fire safety activity with occupiers.

Not all premises are connected to an 'automatic call-up' in the event of alarm activation. Therefore, a nominated employee will call the fire service in accordance with local procedures. The first course of action for anyone discovering a fire is to raise the alarm for the safety of all occupants. Only employees who have been instructed and authorised to use fire-fighting equipment should attempt to tackle a fire, and they should not tackle anything larger than a fire the size of a small waste paper bin. This must only be attempted if it doesn't expose the employee to personal risk in accordance with their training. The route of safe exit must be kept clear at all times so they can safely evacuate at any time. The prime consideration is to ensure the safety of life; it must override all other considerations when choosing whether to tackle fires and employees should always evacuate if unsure.

Due to the high risk from fire, OFG have a specific Fire Safety Policy which is available on the OFG Resources Health & Safety page

HS8 FIRST AID

OFG recognises the importance of providing suitable first aid arrangements to reduce the effects of injury or illness suffered at work by employees and those who reside at or visit our establishments, and to promote recovery. The organisation's policy therefore, is to provide adequate and appropriate equipment, facilities and trained personnel to enable first aid to be given to employees if they are injured or become ill at work.

The level of first aid provision required on sites, taking into account static and mobile employees and for those who work alone, will be risk assessed at site level using the company 'first aid needs risk assessment' template. Following the first aid needs assessment, we will provide adequate first aid provision by way of equipment, enough suitably qualified first aiders and, where necessary, facilities to meet the requirements as identified.

OFG will provide training to those employees nominated to act as first-aiders and their deputies There are 3 training courses available, these are booked via the Learning and Development Department:

- Emergency First Aid at Work (EFAW) training: this enables a first-aider to give emergency first aid to someone who is injured or becomes ill while at work.
- First Aid at Work (FAW) training includes the same content as EFAW and also equips the first aider

to apply first aid to a range of specific injuries and illness.
- Paediatric First Aid – specifically for child related incidents in schools and homes (children aged 5 and under)

Within Care provision (i.e. Children or Adult Care Home), all staff who are able to will be provided with EFAW training.

Within educational settings, all sites will be provided with an automated external defibrillator (AED).

Training will be provided via a competent and registered first aid training provider or internally where trainers are approved and available. Those with specific responsibilities to 'induct' new starters must ensure that local first aid arrangements are communicated as part of the induction training, this includes the checking of in-date and sufficient supplies of on-site first aid equipment and arranging replacements where required.

The management will ensure that:
- Employees are familiar with the identity of the trained First Aider and the location of the nearest First Aid Kit (office specific to be identified on Induction).
- The First Aid kit is easily accessible at all times.
- Professional medical advice is sought when necessary.
- All relevant details are recorded on the accident and incident report form when necessary.

The names of First Aiders are displayed on the first aid notices in a prominent position on the notice boards. The First Aid box will be checked and restocked by the nominated First Aiders.

HS9 HOME AND LONE WORKING

Lone workers are those employees who work by themselves without close or direct supervision. OFG have a number of job roles that result in lone working situations. These include roles such as Care Workers working nightshift, home workers, Maintenance, Kitchen, support roles such as area line management and trainers, and employees that may work in office locations early in the morning, late at night or on weekends. Where employees are identified as working in a lone working situation, line managers will make sure a risk assessment of their role is undertaken to evaluate the lone working activities and the need for appropriate risk control measures. These could include appropriate communication devices, timed reporting-in procedures, records of whereabouts, emergency procedures, fitness checks, tracking devices, alarms and provision of any additional personal safety training required.

Where the risk assessment concludes that the remaining risk from any lone working activity is high and that the activity cannot be carried out in a safe environment or manner, employees will be instructed that they must immediately leave any situation in which they feel unsafe. Home workers should carry out their own visual safety checks on their domestic electrical supply and their workstation in line with the guidance provided on display screen equipment. Employees should report back to their line manager any concerns they have about the safety of their home working arrangements. Photographs of the home workstation should be requested to support the workstation assessment where issues have been identified rather than a home visit by a risk assessor to provide appropriate advice, a remote assessment via Teams or other webcam enabled software may be required.

Where home working is a permanent arrangement or occurs on a frequent basis and the employee works from a laptop, arrangements should be made to set-up a docking station type set-up with a separate keyboard and mouse and screen or riser at an appropriate height. Correct posture is essential to reducing risks from regular DSE usage and therefore where medium to long term home working is required, a suitable adjustable chair should be provided and used. It is not envisaged that home workers invite other workers, carers or children into their home in connection with work.

Any OFG equipment provided for home use remains the property of OFG and should be checked and maintained the same as any site-based equipment. In the event of site closures due to a pandemic or other significant event, many more people will be required to temporarily work from home. For temporary working from home, a formal workstation risk assessment is not required however the display screen equipment requirements and risk assessment principles will still apply to these temporary arrangements the same as office based fixed computers. The Health and Safety executive do not define how long temporary is in the context of workstation risk assessments, BGUK requires that any employee who has been working from home for around a year or more due to pandemic restrictions should complete a formal workstation self-risk assessment. The health and safety department can also provide further advice and support.

HS10 LEGIONELLA

Legionnaire's disease is a potentially fatal form of pneumonia which can affect anybody. It is caused by the bacterium Legionella pneumophilia. Legionella bacteria are widespread in natural water systems, e.g., rivers and ponds. However, the conditions are rarely right for people to catch the disease from these sources. Outbreaks of the illness occur from exposure to Legionella growing in purpose-built systems where conditions are suitable to encourage growth, e.g., evaporative condensers, spa pools, and hot water systems used in all sorts of premises (work and domestic).

OFG have a specific Legionella Policy detailing specific requirements for the management of legionella which is available on the OFG SharePoint communication platform Health & Safety page

HS11 MANUAL HANDLING

OFG recognises that not all manual handling operations can be avoided. The definition of a manual handling operation is "any transporting or supporting of a load (including the lifting, putting down, pushing, pulling, carrying or moving) by hand or bodily force". A load can include boxes, packages, equipment and people.

The primary responsibility is to avoid any hazardous manual handling operations so far as is reasonably practicable. Where these cannot be avoided risk assessments must be conducted for any manual handling activities. If a risk assessment highlights there is a foreseeable risk to employees or people we support from the manual handling of loads or people then a number of measures will be considered in controlling the risks. Different forms will be used for assessing objects compared with handling people or for employees with disabilities or special needs.

Our aim is to reduce the risk of injury so far as is reasonably practicable and the use of handling equipment can greatly help. However, it is essential that equipment is maintained in good working order and suitable for the task, the environment, the load and that the employee operating it is trained and authorised. The risk assessment will be kept up to date and reviewed if new information around the task is received, if there is a change in the manual handling operation or if an injury occurs from the task.

For any employees who are more vulnerable to risk i.e., young workers, new and expectant mothers, assessments will be reviewed taking into account their individual needs. All employees must follow any safe system of work provided by their site; this includes the use of any equipment provided.

General manual handling training will be provided upon employment with refresher training every three years. For employees engaged in higher risk handling activities and/or people handling, this must repeated at least annually.

HS12 NEW AND EXPECTANT MOTHERS

The phrase 'new or expectant mother' refers to an employee who is pregnant, who has given birth within the previous six months, or who is breastfeeding. OFG will, when carrying out risk assessment activities, give consideration to new and expectant mothers. An initial risk assessment will be completed as soon as their line manager or HR is formally made aware by the employee that they are pregnant, has given birth or is breast feeding.

A specific risk assessment will be carried out for the new and expectant mother in addition to the site general risk assessments and this must be reviewed periodically, normally monthly, through the course of the pregnancy and upon the employee's return to work. Rest facilities will be provided for employees who are pregnant or breast feeding, these may include the use of a manager's office, the rest room or other suitable location identified through the risk assessment process.

HS13 NOISE AT WORK

OFG recognises that it is our duty to protect employees and any other person who could be affected by our work activities, against the risk to their health and safety from exposure to noise at work. The environment in which we work is generally unlikely to create noise of sufficient levels to permanently harm health, however if work is to be undertaken which is likely to expose an employee to noise at or above the lower exposure

action value then a risk assessment on the levels of noise the employee will be exposed to will be undertaken. Workplace risk assessments will also be completed, where necessary, following any concerns raised by employees surrounding work equipment located close to their workstations.

Where it is reasonably practicable to do so, the risks from noise exposure will be eliminated. If this is not possible then the risks will be reduced to as low a level as possible. If an employee's exposure to noise levels exceeds the upper action value then a program of measures to reduce this will be further introduced. Personal hearing protection will be available to any employee at request who is likely to be exposed to noise at or above the lower exposure action value. Hearing protection will be provided to any employees who are likely to be exposed to noise levels at or above the upper exposure action value. Suitable and sufficient information, instruction and training will also be provided to employees who are exposed to noise which is likely to be at or exceed the lower exposure action value.

Any equipment used to control levels of noise will be maintained and employees are given suitable and sufficient instruction and supervision on how to use the equipment. Any hearing protection must be properly utilised by employees and any defects to equipment reported. Suitable health surveillance will be provided to any employees who have been identified as at risk of exposure to noise whilst at work.

HS14 PERSONAL PROTECTIVE EQUIPMENT (PPE)

The use of Personal Protective Equipment as a risk control measure is always a last resort as it only protects the individual user provided it is worn correctly. Our employees will be supplied; free of charge, with any PPE identified as a risk control measure from the risk assessments for the work activities undertaken. All PPE supplied shall be CE marked, a good fit, suitable for the employee using it and compatible with any other PPE required to be used at the same time. Suitable storage to prevent damage to the PPE will be provided as appropriate and employees will be provided with adequate instructions and training on its correct inspection, use, cleaning, storage, maintenance and disposal.

For employees who are required to use or wear PPE as provided, this is compulsory and not an option whether to wear it or not. OFG will only accept genuine medical reasons for not using PPE. In these circumstances a written note from a medical practitioner or occupational health specialist will be required so that a suitable alternative can be found or reasonable adjustments can be made. Information and training will cover the circumstances in which PPE is used, the hazards against which it will give protection, the importance of its correct use and any limitations of the equipment. The requirements for using PPE, and the type of PPE, will vary by services due to the different activities being undertaken and risk exposures, especially from pandemic viruses such as Coronavirus. Specific policies, safe operating procedures, risk assessments and training will be developed and implemented in those business areas to address the risks taking into account the latest Government and Health advice.

HS15 PROVISION AND USE OF WORK EQUIPMENT

Work Equipment includes a wide range of items, for example, photocopiers, ladders, maintenance equipment, kitchen equipment. Before any new work equipment is provided, risk assessments will be completed so that appropriate controls can be implemented. These controls will ensure it is selected and installed properly, used correctly and maintained to protect the health and safety of our employees and others who may be affected by the way in which it is used. Sensible risk assessment is the key control measure and will ensure that the manufacturer's recommendations for use and maintenance and the need to train employees are implemented. Work equipment must be CE or UKCA marked.

Risk assessments will include taking reasonable steps to ensure that new work equipment complies with the relevant legal requirements for safe design and construction. OFG will not use, or permit the use of, unsafe work equipment and will therefore implement defect procedures which are checked upon during routine health and safety audits and inspections. Defects to any piece of equipment will be reported to line management and the equipment taken 'out of service' and made safe. All equipment must be suitable for its purpose, where appropriate have the manufacturer's instructions available and employees will be trained to use the specific piece of equipment.

Many of the risks caused by work equipment can be reduced by careful selection of the correct piece of equipment, routine maintenance and pre-use visual inspection. This will be identified and controlled through the risk assessment process at the purchasing stage, through to when it is deployed, put into use and disposal. Particular attention will be given to equipment compatibility.

Some work equipment such as Lifting equipment requires additional routine inspections. Unless there is an 'examination scheme' specifying other intervals, thorough examinations should be conducted as detailed below:

- 6 months, for lifting equipment and any associated accessories used to lift people
- 6 months, for all lifting accessories
- 12 months, for all other lifting equipment

Employees will not interfere with or modify any safety device fitted to work equipment and are required to follow any verbal, visual or written instruction on its correct use. Each operator and supervisor of work equipment must be trained in the methods of use for the equipment, any risks arising from the equipment, and the appropriate precautions.

With the exception of company laptops and mobile phones, under no circumstances may work equipment be taken off site for personal use or used onsite for personal use. This includes but is not limited to maintenance tools and vocational mechanical equipment being used on personal vehicles.

HS16 REST ROOOMS AND STAFF FACILITIES

Suitable and sufficient rest facilities will be provided on site with a sufficient number of seats (with backrests) and tables available. Any rest facility will be sited in an area where personal protective equipment does not need to be worn and where employees will not be subject to any excessive disturbances or discomfort.

Facilities will be made available to eat meals away from areas of risks where food would otherwise be contaminated. Facilities will be available on site to enable employees to make a hot drink e.g. kettle, hot water boiler. OFG also recognises the requirement to provide suitable rest facilities for expectant or nursing employees. This may include a first aid room, or a bed in an unoccupied room, or an appropriate private office. For project works the provision of associated welfare facilities will be managed in accordance with applicable legislation.

HS17 RISK ASSSESSMENT

OFG believes that Risk Assessment is a key management tool for managing risk. The purpose of risk assessment is to ensure we are complying with the relevant statutory requirements, to proactively remove risk where practicable and then to reduce remaining risk to an acceptable level by developing appropriate policy and control measures. This assessment activity covers all topic areas associated with physical, chemical, environmental and personal risk for health, safety and welfare. Assessments will take into account both when activities are running normally and when breakdown or maintenance is required.

All risk assessments will be reviewed when it is suspected they are no longer valid due to changes in work activity, the environment, the premise, the equipment, the persons affected or periodically i.e. the greater the risk the more frequent the review or if the risk keeps changing and evolving faster than the normal scheduled review period e.g. during a pandemic outbreak. In all cases, risk assessments will be reviewed at least annually and re-written every three years. Risk assessments will also be reviewed following serious incidents as part of the accident investigation process. The findings of any central monitoring of incident data will be fed into the risk assessment review process. General and specific risk assessment formats will be developed and continually improved based upon latest guidance and knowledge to ensure the most appropriate methods and formats are used within OFG sites. Any risk assessment will pay particular attention to those

categories of person who are especially at risk such as young workers, expectant and new mothers, those with disability or underlying health condition and any identified special risk factors.

Risk assessments will take into account the known hazards associated with the task and what controls are in place to control exposure to hazards before evaluating their effectiveness and the likely remaining risk. Scoring mechanisms may be used to help prioritise action. However, it is recognised that any evaluation is a personal judgement based upon the experience and knowledge of the risk assessor. Training and information will be provided to all persons expected to carry out Risk Assessments. The findings and control measures identified within the risk assessment will be communicated to employees and where appropriate third parties. Where the risks need to be controlled further due to potential consequences of failure, safe working practices will be developed and implemented.

Safe working practices can include verbal instruction, signage, guidance material in written and visual forms, training, written procedures and flow charts, and in the most safety critical activities a system of authorisation and permits to work. With all risk assessment controls, a principle of prevention will be adopted as the primary response following which a hierarchy of control will be followed with personal protective equipment used as a last resort.

In some situations, it is recognised that emergencies can and do occur which require managers to make quick decisions to mitigate and control risk. The principles of risk assessment should always be followed. However, time and the situation faced may not allow for the recording of these before action is taken. This is called dynamic risk assessment. Once the situation is under control and being safely managed, a record should then be produced which will document what decisions were taken and why. This can then be fed into the process during the next risk assessment review.

HS18 SMOKING / VAPING

OFG takes the view that smoking is a hazard to the health of all its employees either through the direct inhalation of smoke or as a result of passive smoking. The company also considers that smoking and the use of ignition materials constitute a fire hazard. Since 2004 in Ireland, 2006 in Scotland and 2007 in England and Wales, smoking has been banned in nearly all workplaces. Therefore, it is the Policy of OFG that all our workplaces are smoke free.

All site managers in control of premises are required to display no-smoking notices and take reasonable steps to ensure that employees and visitors are aware of the law and do not smoke in buildings.

Vehicles used for business purposes are also affected by the law, therefore smoking in company vehicles is not permitted. Smoking is also not permitted in any private vehicle when used on company business if it is being used to carry passengers.

So-called e-cigarettes (electronic cigarettes / vapes) have become more popular as an alternative and a means to quitting smoking. There is evidence to suggest that these still affect the health of the user, can give the perception of normalising smoking and introduces risks of fire from charging or when they fail. For this reason, OFG treats the use of these the same as a normal cigarette on all our premises.

OFG has a specific ‘Smoke Free Policy’ which is available on the OFG SharePoint communication platform Health & Safety page.

HS19 STRESS IN THE WORKPLACE

Work-related stress is a major contributor and cause of occupational ill health, poor productivity and human error. Through organisational risk assessment we will seek to identify the main causal factors and develop a proactive response to pressures in the workplace that can cause work-related stress. We manage the main risk factors of work-related stress through the application of various policies at local levels, these include

Absence Management, Bullying and Harassment, Equal Opportunities and Diversity, Flexible Working, Working Time, Grievance and Whistleblowing.

OFG surveys its people on a regular basis. The commentary is reviewed to identify the possibility of stress related issues in the workplace. Where issues are identified, the survey results can be used to develop action plans that are implemented by Department Heads. Signs of stress may be picked up through the appraisal process, absence records, ill health, significant variation in work standards, rapid mood changes or through general interaction between the line manager and employee. Where required, line managers will assess the risks to an individual when an employee starts to show that they are exposed to factors that may contribute to work related stress. Local management practices will be used to resolve any identified issues, and support to all stakeholders is provided through internal Occupational Health services. Any member of our staff who is, or is believed to be experiencing work related stress can access our Employee Assistance Programme (EAP) when confidential counselling may be recommended.

OFG businesses will provide training and support for line managers to ensure effective management processes are followed including how to identify signs of and reduce stress at work. Persons identified as being affected by stress should have an Individual Stress Risk Assessment completed as this will help to identify the stressors and suitable actions in order to prevent or lessen future stress from those stressors.

HS20 TRAINING

The provision of adequate information, instruction and training is a fundamental requirement of health and safety law and OFG recognises this as a key control measure for ensuring that employees and others affected by our operations are not injured or made ill by the work we do. Wherever possible, the risks to health and safety will be controlled through removal of hazards or physical controls introduced to reduce and control the risk. Risk assessment will help us to identify information which has to be provided to employees under specific regulations, as well as any further information relevant to risks to employees' health and safety.

All employees will receive health and safety training when they are first employed with OFG, if their role significantly changes and they are exposed to new risks, if new equipment or procedures are introduced that affect their safety and in all cases as appropriate to their role as identified by the risk assessments. Refresher training in all health and safety related policies and topics should be repeated at least every three years unless the risk is greater in which case more frequent refreshers may be required i.e. fire drills.

In entrusting tasks to our employees, we will take into account their capabilities with regard to health and safety. Further specific training requirements are also identified in the property policies and standard operating policies, including for higher risk issues such as for fire safety, water hygiene and asbestos.

Relevant information on risks and on preventive and protective measures will be limited to what employees need to know to ensure their own health and safety and not to put others at risk. The requirements of specific health and safety training within OFG are contained in the Learning and Talent department documentation and procedures.

All formal health and safety training will take into account the needs of the trainee and where possible will be pitched at an appropriate level taking into account their current level of training, knowledge, experience and any special needs due to language, disability, or any other influencing factor. Records will be retained to evidence training and all employees are required to co-operate with the training and instructions given to ensure their own and others health, safety and welfare. The level of and detail contained within the training will always be appropriate to the level of risk exposure.

HS21 DRIVING AT WORK

Transport management is not a main-stream activity of OFG; however, there are many employees that drive for work in either a company provided vehicle or their own vehicle, known as 'Grey Fleet'.

It is estimated that more than a quarter of all road traffic incidents may involve somebody who is driving as part of their work at the time (Department for Transport figures). Health and safety law applies to work activities on the road in the same way as it does to all work activities, therefore it is paramount that the risks to drivers (and others who may be affected) are included as part of health and safety arrangements. In all OFG locations, risk assessment is the key tool used to identify hazards, risks and appropriate control measures. Therefore it is OFG policy that each service conduct a driving at work risk assessment.

OFG have a specific Driving at Work Policy detailing specific requirements. This is available on the OFG SharePoint communication platform Health & Safety page.

HS22 VIOLENCE AND AGGGRESSION AT WORK

Violence at work is defined by the Health and Safety Executive as 'Any incident in which a person is verbally abused, threatened or assaulted in circumstances relating to his or her employment'. At OFG, we take the safety of our colleagues very seriously. We understand that caring for and managing people with difficult or challenging behaviour can sometimes lead to incidents of violence or aggression in the workplace.

To manage these risks, risk assessments of relevant work activities are conducted. Due to the complexity and nature of violence and aggression at work a number of key internal stakeholders will be involved with the process. Reported incidents will be robustly investigated at site level, staff will be debriefed, and learning points then incorporated into working procedures.

We also provide training in avoiding confrontation and the management of aggression for all appropriate colleagues. Our training programmes incorporate Positive Behaviour Support (PBS), trauma informed and person-centred approaches.

Management support, and an employee assistance programme (EAP) is available to those colleagues who have suffered from verbal abuse or physical assault. Instances of any injury sustained must always be recorded as detailed in the accident policy so these can be monitored and acted upon.

In addition, we have a zero-tolerance policy towards all instances of abusive and violent behaviour directed at our colleagues from third parties and we are prepared to take action if necessary to ensure staff safety. Therefore we may involve the Police and seek a conviction of any person who assaults a colleague.

HS23 WORKING AT HEIGHT

Falls from height can result fatalities, or in life changing injuries that can have a devastating impact on the injured person and their family. For that reason, the overriding policy will be that working at height will be avoided wherever it is reasonably practicable to work other than at height. However, at times, working at height cannot be avoided and we will ensure that where this is the case, suitable and sufficient risk assessments will be undertaken at site level to identify the precautions to reduce the risks to as low as reasonably practicable when working at height.

Site leaders will ensure that following on from the risk assessments, suitable precautions will be applied to prevent a fall from height or reduce the distance or consequences of a fall. The use of ladders and stepladders will only be used where the use of more suitable access equipment cannot be justified for low risk, short duration work. Each site will ensure that work equipment such as; ladders, step-ladders, tower scaffolds and any other access equipment are inspected at suitable intervals with records held of those inspections as determined by the risk assessment and the work at height regulations. Repairs to any ladders, steps, etc., must only be carried out by an approved and competent person. Damaged equipment should not be used and redundant equipment should be appropriately removed from site. Site leaders will ensure that employees identified as being required to work at height are suitably trained before doing so or before using work equipment for such work.

HS24 WORKING TIME AND NIGHT SHIFT WORKERS

There are specific regulations that cover working time and health surveillance of night shift workers as working excessive hours or during hours when the body would naturally be asleep can create situations of increased risk through drowsiness and fatigue. There is evidence to suggest that there can be some effects to the health and wellbeing over a prolonged period and therefore limitations are laid down in law.
In the UK the Health and Safety Executive (HSE) is not only responsible for the enforcement of the maximum weekly working time and night work limits but also the health assessments for night work. The effects from working nights and shifts are potential hazards and therefore controls will be included within the business site risk assessments. Where significant changes are to take place around working hours, shifts and patterns, the employees affected will be consulted as detailed in HS3. All employees should be encouraged to take their breaks during their time at work and should avoid ‘working through’ or taking ‘short breaks’ to ensure their own health and wellbeing, especially when driving, and to comply with the regulations.

HS25 WORKPLACE HEALTH, SAFETY AND WELFARE

OFG recognises the importance of a healthy and safe work environment. So far as is reasonably practical, we’ll make sure that all workplaces that are under our control are effectively maintained in an efficient state, efficient working order and in good repair (this includes keeping workplaces clean, tidy and free from waste materials). Many OFG workplaces already have suitable windows and other openings to allow sufficient ventilation of the workplace. Where required we will provide mechanical ventilation for enclosed workplaces and ensure this equipment is maintained. We will endeavour to maintain workplace temperatures that are acceptable to users of the premises and ensure thermal comfort for its employees. Workplaces will be provided with a sufficient number of thermometers so that workplace temperatures can be monitored.

In addition, all workplaces have suitable natural and artificial lighting which is at the correct levels for the nature of the task being performed. Floors, corridors and stairs will be free from obstructions and all employees play a part in the ongoing enforcement of this requirement. Site level inspections and risk assessments will be carried out and take into account general workplace hazards and the requirements of the workplace health, safety and welfare regulations. This includes hazards associated with the outside of

the building such as window cleaning, drainage, traffic control and seasonal factors such as rain, snow and ice. Local site arrangements and procedures will be implemented to ensure the maintenance and safety of the facilities and equipment, with adequate levels of supervision and appropriate health advice provided to reduce the risk of individual harm.

HS26 YOUNG PERSONS, WORK EXPERIENCE AND VOLUNTEERS

Under Health and Safety law, a Child is classed as a person under the age of 16, a Young Person is classified as a person under the age of 18. Work experience tends to be carried out by persons whom are classed as a young person or a child. In all cases, including volunteer work, we will ensure that a young person/child are protected at work from any risks to their health and safety which are a consequence of their lack of experience, or absence of awareness of existing potential risks, or the fact that they have not yet fully matured.

A risk assessment will be carried out to determine the level of information, instruction, training and supervision that is required to fulfil this commitment. Some equipment, tasks and work areas may be prohibited or restricted to ensure risks are reduced to the lowest level reasonably practicable. External organisations often require sight of policies, risk assessments, insurance and implemented or agreed controls before they place a person on work experience or in a volunteer position. A traffic light zoning approach can often be used in the assessment process to identify which tasks and areas are safe “Green”, which tasks and areas require a greater level of close supervision and instruction “Amber”, and those activities and areas which are off limit or not appropriate and therefore prohibited “Red”.

5.0 OUR RESPONSIBILITIES

OFG recognises that as an employer, the company and its employees have prescribed statutory duties. All employees are made fully aware of their responsibilities and role in contributing to maintaining a safe working place.

The Board of Directors

The Board of Directors have ultimate responsibility for ensuring that the duties imposed on the company as the Employer under the Health and Safety at Work etc 1974 Act, and other relevant legislation are carried out and will:

- Ensure there is an effective health and safety management structure;
- Ensure that key posts are filled by competent individuals and the requirements of these posts are being met;
- Ensure that matters of health and safety are as equal importance as other key business functions;
- Ensure that the Board provides as far as is reasonably practicable the resources deemed necessary, to fulfil the requirements determined by statute;
- Review safety performance of the company.

Chief Executive Officer (CEO)
The CEO has overall responsibility for ensuring that the company meets its statutory obligations and that effective arrangements for the management of health and safety are put in place.

Whilst overall responsibility lies with the Group CEO, executive responsibility is delegated to the Managing Directors of specific services for managing health and safety, including compliance with relevant legislation, quality standards and company policies.

COO, Managing Directors
The Managing Directors of specific services have executive responsibility to manage health and safety including compliance with Health and Safety at Work Act, etc. 1974 and other relevant legislation, best practice guidance and company policies.

The Managing Directors are ultimately responsible for the health, safety and welfare of all employees of the company, whilst they are at work on company property or while undertaking their duties of employment, and that of the people we support. This responsibility also extends to visitors, contractors and members of the public (including people we support) who may be effected by business activities or who are on company

premises:

The Managing Directors of specific services will:

- Provide adequate resources to implement the Policy;
- Ensure there is an effective health and safety management structure;
- Ensure that health and safety considerations are integral to the overall management culture;
- Make adequate channels of communication available to employees so health and safety concerns can be raised, debated and appropriately resolved;
- Ensure establishment and maintenance of effective health and safety management systems within each service and department;
- Ensure the appointment of a competent person(s) to assist with the development and implementation of the policy and providing competent advice in health and safety matters;
- Ensure review and monitoring of safety performance;
- Promote a positive safety culture through appropriate support and encouragement.

Regional Directors / Operations Managers / Heads of Service or Function
Regional Directors / Operations Managers / Heads of Service have overall responsibility for the implementation of this policy within their respective services (residential homes, schools, supported living services).

Regional Directors / Operations Managers / Heads of Service will:

- Ensure safe working conditions are maintained for employees, visitors, contractors, people we support and members of the public within their services;
- Report any matters relating to health and safety directly to their Managing Director and the Group Head of Health and Safety;
- Develop a positive attitude to health and safety among employees by demonstrating their own commitment to achieving a high standard of health and safety performance;
- Ensure that safety is given adequate consideration in all projects / schemes undertaken;
- Ensure that the arrangements of the company Health and Safety Policy are fully understood and observed at all levels of management and by all employees within their service area;
- Delegate responsibilities for health and safety matters to all levels of management within their service area and ensure that they are adequately trained and instructed to undertake such responsibilities.

Group Head of Health and Safety
The Group Head of Health and Safety will:

- Examine the requirements of laws, orders, regulations, and codes of practice relevant to the health and safety of employees and people we support in the company and to the health and safety of others towards whom the company has duties under the Health and Safety at Work etc. Act 1974;
- Devise the company's health and safety system and associated policies and procedures;
- Advise all levels of management regarding the implementation of the company's health and safety system, policies and procedures including accident / RIDDOR reporting;
- Monitor accidents / incidents and liaise with managers regarding remedial actions;
- Ensure the updating and amendment of the Health and Safety Policy and associated policies and procedures as required, and that amendments are brought to the attention of all levels of management;
- Advise on information, instruction and training requirements relating to health and safety and liaise with the Learning & Training department to ensure implementation of health and safety training programme;
- Prepare reports and summary statistics to the Managing Directors;
- Report to the Board as required on health and safety matters and advising as necessary;
- Represent the company in any matters relating to health and safety and liaise with inspectors of the enforcing authorities;
- Review and monitor the company's health and safety performance.

Registered Managers / Principals / Head Teachers / Office Managers
Registered Managers / Principals / Head Teachers / Office Managers have direct responsibility for health and safety matters relating to the service (residential homes, schools, supported living services, offices)

under their control and for persons reporting directly to them and are therefore responsible for the implementation of the provisions of health and safety policies.

These Managers will:

- Be responsible for implementing the Health and Safety Policy, codes and procedures in the service (residential homes, schools, supported living services) under their control and ensure this is brought to the attention of all employees;
- Ensure that all subordinates carry out their duties under the Health and Safety Policy;
- Co-operate with the Group Head of Health and Safety on matters affecting health, safety and welfare of employees and people we support;
- Liaise with the Group Head of Health and Safety on any activities, equipment, areas deemed to be unsafe and any breach of statutory requirement in the service under their control and which they cannot effectively deal with;
- Ensure that people we support are involved in health and safety matters;
- Report any building related issues to their Facilities Manager or the Regional Property Managers;
- Carry out suitable and sufficient risk assessments, implement control measures to reduce the risk and devise safety systems of work;
- Ensure that all employees are fully aware of and understand the outcomes of site risk assessments and those of people we support and that employees adhere to the detailed control measures;
- Promote a positive safety culture through leading by example and providing appropriate support and encouragement;
- Ensure adequate instruction and supervision to ensure that work is undertaken in a safe manner;
- Ensuring that all employees receive adequate / appropriate training in order to comply with legislative requirements in liaison with the Learning & Training department and the Group Head of Health and Safety;
- Ensure that business continuity and emergency response plans for their service are prepared and kept up-to-date;
- Ensure that adequate first aid facilities are provided at their service;
- Ensure that accidents, incidents, dangerous occurrences and near misses in the service under their control are reported in accordance with the company procedures (also where required to the HSE under RIDDOR), thoroughly investigated, and resulting remedial actions implemented;
- Carry out periodic safety inspections of the service under their control and ensure any remedial actions addressed;
- Be available for contribution to external safety inspections / audits for the service under their control;
- Ensure the service buildings, grounds and equipment are fit for purpose and routinely maintained;
- Ensure that contractors on site adhere to the company safety policies and adhere at all times to their legal and contractual responsibilities;
- Make available all necessary personal protective equipment;
- Ensure cleanliness and hygiene standards are maintained throughout the service
- Ensure asbestos management plan is in place if asbestos containing materials have been confirmed in the service under their control.

Appointed Health and Safety Representatives (co-ordinators)

The services (residential homes, schools, supported living services) have nominated Safety Representatives / Coordinators.

Safety Representative / Coordinators' role is to:

- Report any health and safety hazards to the Registered Manager / Principal / Head Teacher that could affect the group of employees they represent and ensure employees are informed of responses and actions;
- Assist the Registered Manager / Principal / Head Teacher to carry out health and safety risk assessments specific to their service;
- Encourage employees to report all accidents, incidents and near misses events on the electronic platforms;
- Assist in an incident, accident or near miss event reporting and subsequent investigation within their service;
- Carry out health and safety inspections / checks at least monthly and report any hazards to the

Manager in a timely way;
- Represent the group of employees in consultation with management on health and safety issues ;
- Support in the induction of new employees covering the health and safety aspects of their induction;
- Maintain health and safety records in their service folder;
- Assist in completing the health and safety documents and keeping them up-to-date.

Employees
All employees will undertake their responsibilities and behave at all times in a manner that takes full account of health and safety matters, in particular cooperation with management to achieve a healthy and safe environment, attend all relevant training and follow all relevant policies and procedures.
Employees are encouraged to play an active role by being consulted on the health and safety policies and procedures, taking part in health and safety inspections and attending meetings within their service. Breach of Health and Safety policies or procedures is a serious disciplinary matter and may constitute gross misconduct.

All employees have specific health and safety responsibilities to:

- Be aware and adhere to the company Health and Safety Policy, procedures, risk assessments, safe systems of work including departmental or site safety requirements;
- Take reasonable care of their own health and safety, and the safety of other persons who may be affected by what they do or do not do;
- Be familiar with fire and emergency evacuation procedures and drills (including provisions relating to the people we support);
- Presenting themselves for work in suitable clothing / footwear to carry out their contracted duties in a safe manner, as determined through the risk assessment process, adhering to any uniform policies and accepted health care protocols where relevant;
- Ensure jewellery should be kept to a minimum due to the needs of the people we support. Nails should be kept short, therefore minimising risk of injury to the people we support;
- Correctly use work items, including personal protective equipment, in accordance with training and instructions;
- Must not intentionally misuse or recklessly interfere with anything provided for health and safety reasons;
- Co-operate with the employer on matters relating to health and safety;
- Immediately report to their line manager any serious and imminent danger to health and safety and any short comings in health and safety arrangements;
- Report and record all incidents, accidents and near miss events appropriately;
- Comply with all hazard / warning signs and notices displayed on the service premises;
- Remove or warn others of a hazard e.g. spillage, in an appropriate way;
- Conduct themselves in an orderly manner and refrain from any form of behaviour, which could lead to accidents or injury;
- Attend as requested, any health and safety training courses;
- Check any equipment before use and report any faults / damage to their line manager; and
- Not undertake any task for which authorisation and / or training / instruction has not been given.

6.0 CONSEQUENCES OF NOT FOLLOWING POLICY

It's everyone's responsibility to follow the principles within this policy and associated documentation.
If there is a breach of this policy:

- there is a real chance that someone could be injured and harmed.
- we don't deliver the best outcomes for our people, or the people we support.
- we risk exposing OFG to prosecution, reputational damage and/or financial penalty.
- appropriate action may be taken in accordance with OFG disciplinary policy.
- where the individual is held liable for a breach of health and safety rules by the regulator, regulatory action may include prohibition, individual fines and other legal sanctions.

7.0 SAFETY MANAGEMENT ARRANGEMENTS, MONITORING AND REPORTING

Planning; To manage and mitigate any hazards and risks all OFG sites must have:

- an effective approach to the completion of a risk assessment. Where necessary, these include an action plan with deadlines for the completion of both the risk assessment process and the introduction of any subsequent preventative and protective measures.

Organisation; OFG sites will organise operations to:

- Involve employees and their representatives in carrying out risk assessments, deciding on preventive and protective measures and implementing those requirements in the workplace. This may involve the use of the health and safety committees, and by the use of networking to share knowledge and good practice. Employees are also to be involved in deciding on the appropriate preventive and protective measures and written procedures;
- Establish effective means of communication and consultation in which a positive approach to health and safety is visible and clear. We ensure adequate health and safety information is collected and make sure it is communicated to employees and their representatives, so informed decisions can be made about the choice of preventive and protective measures. Effective communication ensures that employees are provided with sufficient information so that control measures can be implemented effectively;
- Secure competence by the provision of adequate information, instruction and training and its evaluation, particularly for those who carry out risk assessments and make decisions about preventive and protective measures. Where necessary this is supported by the provision of health and safety assistance through the central support teams.

Control; In order to have effective control measures in place, all OFG site leaders must:

- Specify clear health and safety responsibilities and ensure that the activities of everyone are well co-ordinated;
- Ensure everyone understands their responsibilities, and make sure that they have the time, training and resources to fulfil these;
- Set objectives to monitor the performance and delivery of those with responsibilities;
- Provide adequate and appropriate supervision, particularly for those who are learning or in a new role.

Monitoring; We monitor the practise of our health and safety policies across all locations to ensure sites:

- have a plan and carry out routine audits and checks to make sure any measures in place are effective;
- adequately investigate the immediate and underlying causes of incidents and accidents to ensure that remedial action is taken, lessons are learnt and longer term objectives are introduced.

We record and analyse the results of any monitoring activity to identify and act upon any themes or trends.

Review; We review our health and safety performance and direction at least once a year to:

- establish priorities for timely and suitable remedial actions that were discovered as a result of monitoring;
- periodically review the whole of the health and safety management system including planning, organisation, control and monitoring to ensure that the whole system remains effective.



Outcomes
FirstGroup