POLICY

Title: Health, Safety and Wellbeing

CCN: City College Norwich (CCN)
Easton College (EC)
Paston College (PC

Policy Holder: Health and Safety Manager

Approval Board: CCN Board

Version No: v1.2

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Summary: This policy is prepared in accordance with Section 2(3) of the Health and Safety at Work etc. Act 1974, with the intention of promoting a safe working environment that will, so far as is reasonably practicable, ensure the safety and health of CCN employees and anyone who may be affected by its business undertakings and to enable the company to comply with UK Health and Safety (H&S) legislation.

Accessibility: If you would like this information in an alternative format, e.g. Easy to Read, large print, Braille or audio tape, or if you would like the procedure explained to you in your language, please contact the College's marketing team on 01603 773 169.

Further information:

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If you have any queries about this policy or procedure, please contact the named policy holder or the College's marketing team on 01603 773 169.

Legislation or Regulation:		Refer to Part 11 of Policy for Legal References.	
Version Control Document			
Date	**Version No.**	**Reason for Change**	**Author**
May 2021	v 1.0	New Policy	J.Jarvey
July 2022 – Aug 2023	v 1.1	Organisational changes / amendments to legislation/ additional sections Firearms and Snow and Ice	Nick Sainton-Clark
Aug / Oct 2024	V 1.2	Annual review. Additional notes on 4.5 – COSHH 4.7 – Contractor Management 4.13 – Emergency Preparedness 4.15 - Excavations 4.17 - Fire Safety 4.17.1 – Smoking 4.21 – Hair & Beauty 4.27 - Lone Working Policy, 4.35 – Stress 4.38.3 – Ventilation 4.38.4 – Sanitary and washing Facilities 4.43 - Wellbeing	Nick Sainton-Clark

[1] The Review Period refers to our internal policy review process. The published policy is current and is the most recent approved version.

Associated College Policies, Procedures and Guidance Notes:

- Business Travel and Subsistence Policy
- Business Continuity Policy
- Contractor Management Policy
- COSHH Management Policy
- Firearm Policy
- Fire Safety Policy
- First Aid Policy
- H&S Policy for Work Placement Checks
- Electrical Equipment Testing Policy
- Lone Working Policy

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Part 1: General Health, Safety and Wellbeing Policy

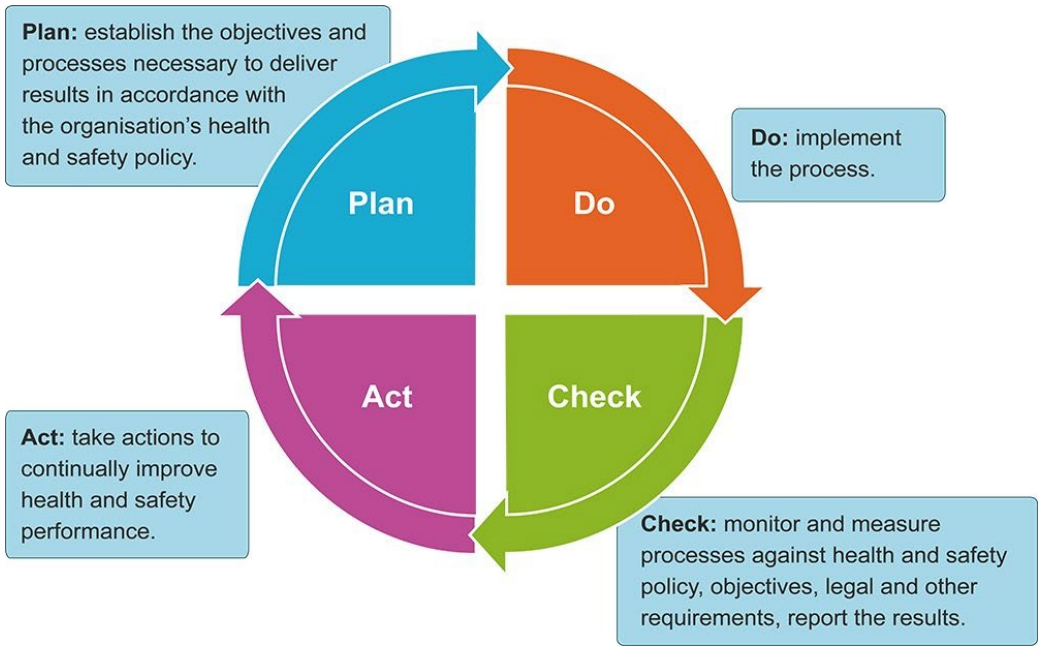
1.1 Introduction

This policy is prepared in accordance with Section 2(3) of the Health and Safety at Work etc. Act 1974, with the intention of promoting a safe working environment that will, so far as is reasonably practicable, ensure the safety and health of CCN employees and anyone who may be affected by its business undertakings and to enable the company to comply with UK Health and Safety legislation.

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

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

1.1.1 HSG65 Model



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

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

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

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

The scope of the Health and Safety Management system is to implement effective policies, hazard controls, health and safety training, equipment management, effective

communication, occupational health provision, auditing and review, document control, as well as identifying where legal compliance is *required*. Controlled copies of all Health and Safety documentation are available on Health and Safety Connect or via the Health and Safety team. Systems are in place for incident reporting and investigation within the incident reporting system.

The policy is divided into eleven parts as follows:

Part 1: General Health, Safety and Wellbeing Policy Statement

Part 2: Organisational Structure

Part 3: Health and Safety Roles and Responsibilities

Part 4: General Arrangements for Health and Safety

Part 5: Health and Safety Information, Instruction and Training

Part 6: Health and Safety Communication

Part 7: Legal Requirements and Updates

Part 8: Monitoring the effectiveness of the policy and its arrangements

Part 9: Setting Objectives

Part 10: Document Control

Part 11: Legal References

1.2 Health, Safety and Wellbeing Policy Statement

The Health, Safety and Wellbeing policy statement demonstrates how CCN will manage and implement **positive** Health and Safety:

*CCN undertakes a range of activities in order to provide further education services. We strive to apply our **'Ways of Working'** in everything we do, encouraging employees and students to be **creative** and **entrepreneurial**.*

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

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

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

- Provide adequate and **consistent information,** instruction, training and supervision to ensure that all employees are competent to undertake their role safely;
- We will ensure employee and student wellbeing by providing a **respectful, fair** and **aspirational** environment to work in;
- Implement and maintain safe and healthy working conditions, equipment and systems of work;
- Consult employees in an **inclusive** and **open** manner on matters that affect their health, safety and welfare whilst at work;
- Undertake hazard identification, risk reduction and implementation of suitable and sufficient control measures;
- We will promote safe working practices to prevent accidents and work-related ill health;
- We will work **collaboratively** with contractors to ensure our safety standards are adhered to;
- Senior management will actively support and encourage a positive and exemplary health and safety culture within CCN and;
- Monitor the performance of both individuals and the organisation to predetermined standards, in order to make continual improvements to health and safety standards

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

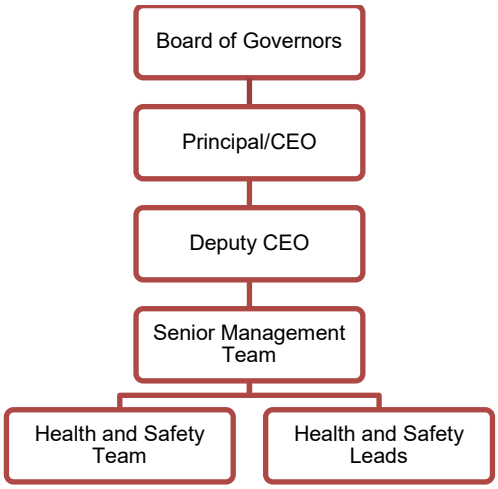
CCN Board Chairperson
Andrew Barnes ----------

October 2024

The current signed policy statement is displayed on all campuses and available as a pdf on health and safety connect.

Part 2: Organisational Structure

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



Part 3: Health and Safety Roles and Responsibilities

3.1 General Responsibilities

3.1.1 Implementation of Policy

Although responsibility for the overall effectiveness of the health and safety policy remains with the Board of Governors; the Principal/CEO of the college is responsible for the day-to-day implementation of the policy. This includes risk assessments to eliminate or reduce, to the lowest practicable level, potential hazards and to satisfy themselves that any activity carried out within their area of authority, conforms to all current legislation, approved codes of practice and guidance.

3.1.2 Co-operation of Employees

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

3.1.3 Health and Safety Assistance

In accordance with Regulation 7 of the Management of Health and Safety at Work Regulations 1999, CCN employs an in-house health and safety team led by the Health and Safety Manager. The Health and Safety Manager has the competency to fulfil the role of competent person, as defined. They provide a strategic direction to the organisation. Advising and assisting every area of the business to implement health and safety systems, policies and procedures to ensure compliance with health and safety legislation, Approved Codes of Practice and guidance.

3.2 Specific Roles and Responsibilities

3.2.1 The Board

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

The Governors review health and safety at their committee meetings and is assigned responsibility for reviewing and approving CCN's Health, Safety and Wellbeing Policy and strategy and ensures the governance of health and safety and provision of a safe, healthy and supportive environment for working and learning.

The role of the Governors in relation to health and safety is to:

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

3.2.2 Principal / Chief Executive Officer

The Principal / Chief Executive Officer of CCN is responsible to the Board of Governors for the development and implementation of the CCN health and safety management system and for ensuring that they meet all legal obligations in relation to health and safety.

The Principal / Chief Executive Officer has ultimate responsibility for:

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

3.2.3 Deputy CEO / Managers / Heads of Department/Area

Managers / Heads of Department are responsible and accountable for the health and safety performance of their department area and should ensure the implementation of the Health, Safety and Wellbeing Policy and associated topic specific policies and procedures within their areas of operation and with necessary supervision:

- Ensuring that health and safety is clearly communicated to employees and students, those responsibilities for health and safety are clearly allocated, and that the correct level of competence and training is identified and provided;
- Ensuring that health and safety is on the agenda for team meetings.

- Ensuring that clear and precise procedures and risk assessments are provided for all significant work activities and the results of these assessments are implemented and communicated to employees and students;
- Ensuring that all health and safety documents are easily accessible to all employees and where necessary students;
- Ensuring that accidents and incidents have been reported, recorded, notified and investigated as appropriate, with findings evaluated and corrective actions implemented, and records are maintained;
- Monitoring health and safety standards on site at regular intervals and ensure remedial action identified in site inspections and audits are implemented; and
- Ensuring that the CEO, relevant Director and Health and Safety Manager is promptly informed of any significant health and safety failure; and
- Lead by example to develop a strong, positive health and safety culture

3.2.4 Health and Safety Team

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

The health and safety team provide the following service:

- Participate in the development and implementation of the Health, Safety and Wellbeing Policy and strategy;
- Create and review health and safety policies in line with current legislation;
- Develop a strong, positive health and safety culture;
- Support the consultation process for Health and Safety across the business;
- Facilitate a health and safety forum for health and safety leads and support them with training and workshops;
- Investigate all serious accidents and dangerous occurrences, identifying areas for improvement;
- Review on a regular basis all health and safety activity reports and performance statistics;
- Provide advice and support on health, safety and wellbeing matters;
- Provide information, instruction and training as required;
- Develop and deliver health and safety campaigns;
- Audit and inspect to ensure legal compliance, and improve health and safety standards across the service

3.2.5 Estates and Facilities Team

The Estates and Facilities team ensures that all necessary compliance and statutory testing, maintenance and inspections across the college estates are undertaken in line with legal requirements including, but not limited to, fire alarms, firefighting equipment, fixed wiring, emergency lighting, fire doors, smoke and fire detection, potential sources of legionella and asbestos containing materials.

3.2.5 Health and Safety Leads

Health and Safety leads are appointed within the line management of department/areas of CCN to help support an effective health and safety culture and assist in the implementation of safety policies and procedures. Any staff holding the role of H&S lead should, as a minimum, hold an IOSH Managing Safely qualification to provide them with a basic grounding in health and safety legislation.

- Provide local support and guidance to staff members in regard to general safety matters.
- Represent the HOA in ensuring that suitable risk assessments and safe systems of work are in place and being followed.
- Assist with any local, specialist technical aspects that relate to safety and compliance.
- Carry out regular safety walk rounds to proactively identify issues in their areas which could cause injuries or incidents, with particular attention to issues relating to fire safety. (Output from walkabouts to be captured via online form) Regularity of walk abouts to be determined by the scope and nature of the areas covered.
- Offering advice and guidance in relation to having suitable department risk assessments.
- Carry out investigations of accidents and incidents which occur within a H&S Lead's departmental remit and which will be allocated via the CCN Accident Reporting System.
- Ensure that HOA's are kept abreast of any safety concerns and matters which require their involvement to address.
- Make Health and Safety Team aware of any issues which need wider discussion/escalation in order to resolve.
- Attend safety related meetings and H&S Forum as required to share experiences and best practice.

3.2.6 Employees

General duties of an employee include:

- Employees are responsible for their own health and safety;
- Ensure their actions will not jeopardize the safety or health of others;
- Obey any safety rules, particularly regarding the use of personal protective equipment (PPE) or other safety equipment;
- Learn and follow the operating procedures, risk assessments and health and safety rules and procedures for the safe performance of the assigned job;
- Comply with information, instruction or training provided;
- Correct, or report any observed unsafe practices and conditions;
- Keep work areas clean and tidy and free from obstruction;
- Make suggestions to improve any aspect of health and safety;
- Co-operate with managers on health and safety matters;
- Take reasonable care of their own health and safety;

- Comply with emergency arrangements;
- Not to interfere with anything provided to safeguard their health and safety;
- Report accidents, incidents and hazards they observe to their Manager. Concerns can be raised at any time about an incident that happened in the past, is happening now, or may happen in the near future. (Whistle blowers are protected by the law and cannot be penalised for raising issues); and
- Report all health and safety concerns to their Line Manager, Health and Safety team, Union appointed safety representatives or their non-union representatives of employee safety

Part 4: General Arrangements for Health and Safety

4.1 General Arrangements

This section identifies the general arrangements in place for Health, Safety and Wellbeing. For more hazardous or complex activities there are also a suite of topic specific health and safety policies which detail what the organisation does to comply with health and safety legislation in these areas. Each department then develops their own procedures using the policies as guidance to identify how they will implement the standards in a practical way.

4.2 Accident/Incident/Near Miss Reporting and Investigation

4.2.1 Accident/Incident Reporting

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

All employees are required to report any accidents, incidents, actual fires, thefts or student welfare incidents and near misses via the electronic reporting system. Whether this be an employee, student, contractor, visitor to the premises or members of the public. A college procedure identifies the steps to take.

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

4.2.2 Accident/Incident Investigations

All incidents should be investigated, initially by a Health and Safety lead, Line Manager or Department Head. Completing the online form and determining the immediate causes and immediate corrective actions required.

The Health and Safety team will also oversee the investigation findings and where required undertake further investigation to identify the underlying causes/deficiencies,

identify corrective and preventive actions, identifying opportunities for continual improvement and communicate results of investigations to all interested parties. As well as reporting under RIDDOR as required. Where staff are off work for 7 days or more after the day of the injury, managers should ensure they have notified the Safety team so that statutory reporting can be made under RIDDOR in a timely fashion.

4.2.3 Near Miss Reporting

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

4.3 Agriculture and Arboriculture

CCN recognises that Agriculture and Arboriculture involve a significant number of high-risk activities. The HSE statistics demonstrate that there are high numbers of rates of fatal injury, agriculture and forestry is the riskiest industry sector.

Risk assessments and safety management systems specific to the work and activities carried out at Easton farm will be developed and implemented by staff suitably experienced and qualified to do so, with support from the Health and Safety team.

4.4 Asbestos

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

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

Estates and Facilities undertake the management of asbestos on behalf of CCN and the Health and Safety policy identifies asbestos and what is in place in order to:

- Take reasonable steps to determine the location of asbestos within its premises (The Asbestos Survey);
- Ensure relevant employees receive regular training and have a level of knowledge and competence commensurate with their involvement in asbestos control procedures;
- Prepare and maintain an Asbestos Management Plan detailing how the asbestos risks are managed;
- Have in place mechanisms which allow The Asbestos Management Plan to be realised;
- Carry out regular reviews and monitor The Asbestos Management Plan accordingly;
- Provide relevant information on location, condition, amounts etc. for all persons who are liable to work on, or in close proximity to, asbestos;
- Presume that any material which could potentially contain asbestos, does so, unless there is evidence that it does not;

- Have in place mechanisms to deal with an emergency situation related to asbestos;
- Compile and maintain an up-to-date record of incidents / occurrences involving asbestos;
- Assess the risks of exposure posed by any incidents / occurrences involving asbestos;
- Comply with the requirements of any Client / Landlord;
- An asbestos management file will be accessible to all CCN owned premises;
- For CCN owned buildings a procedure to effectively identify and manage asbestos containing materials and to reduce the risk of exposure to employees, service users, visitors and contractors will be in place.

4.5 Control of Substances Hazardous to Health (COSHH)

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

To aid CCN in the evaluation and management of hazardous substances in its workplaces, a specific COSHH policy will provide further detailed guidance. To prevent or control the exposure of substances hazardous to health to employees, students and others, the following hierarchy of measures will be adopted:

- Elimination of the use of the substance;
- Substitution of a hazardous substance to a less hazardous form;
- Segregation between persons and the hazardous substance;
- Local exhaust ventilation of appropriate scope and effectiveness;
- Suitable training and planning of activities to minimize exposures
- Provision of suitable personal protective equipment

Up to date Safety Data Sheets (SDS) must be available and a suitable COSHH risk assessment put in place to control the exposure of individuals to hazardous substances which take into account the information provided on the SDS as well as the environment where it will be used and stored, and whether it is being mixed with other products. These control measures must be in place before any substance is used.

COSHH assessments will also be required in respect of emissions and by-products such as wood dust, concrete dust and welding fumes.

Heads of department, managers and technicians are responsible for ensuring the current SDS is obtained and used to undertake the risk assessment. As well as ensuring appropriate storage, transport and disposal. The science and technology faculties have access to the CLEAPSS service that provides the SDS and risk assessments for chemicals used in educations settings. Information provided by CLEAPSS may help inform COSHH assessments but cannot replace them.

The Health and Safety team also provide assistance, training and advice as required.

The Estates and Facilities team are responsible for the maintenance and statutory testing of the mechanical control measures including Local Exhaust Ventilation (LEV) and fume cabinets, which should be inspected in line with HSG258

Estates and Facilities will also oversee the management of legionella which, as a biological hazard effectively falls under the COSHH regulations, however it has been split out for the purposes of this policy. (See section 4.26)

Other legislation applying to substances are the UK Regulations for the Registration, Evaluation, Authorisation and restriction of Chemicals (UK REACH) which includes the requirement for safety data sheets and their specific content. The Great Briton Classification, Labelling and Packaging of substances and mixtures (GB CLP) ensures that products are suitably labelled and marked.

4.6 Confined Spaces

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

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

A confined space is defined as ‘a place that is enclosed or restricted and there is a reasonably foreseeable risk of asphyxiation, loss of consciousness due to an increase in body temperature, drowning, fire or explosion, or suffocation by a free flowing solid such as wool pellets, grain, or sugar’.

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

Only specialist appointed contractors will undertake confined spaces entry. Estates and Facilities team will follow the confined spaces management procedure for managing the contractors and ensure that no or CCN employees undertake confined space entry. Due to the hazardous nature of working in a confined space, a Permit to Work must be used.

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

- No person shall be allowed to enter a confined space unless an adequate assessment of the conditions has been made;
- Suitable control measures introduced including emergency preparedness for rescue and escape and suitable training undertaken; and
- No entry into a confined space will be undertaken without an authorised permit to work. (Refer to the permit to work procedure for further detailed information)

4.7 Contractor Management

A contractor is regarded as any person or company who enters into an agreement (verbal or written) with CCN to carry out services. The works may be for planned preventative

maintenance, emergencies, cleaning, security, statutory testing, construction, renovation of estates or compliance related improvements. Contractors working on site can pose a significant risk to the business, so CCN has a specific contractor management policy and procedures which cover what is required to manage contractors from procurement to delivery.

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

CCN recognises the need for a robust contractor approval system led by Estates and Facilities with support from Health and Safety and HR which takes account of how the contractor and any associated sub-contractors manages health and safety. The system for approval and subsequent oversight of contractors on site will apply equally to those departments other than Estates and facilities who need to source and engage contractors.

During approval, the initial checks are reviewed by the Health and Safety team and include insurances, management of health and safety, general risk assessments, training, any enforcement action.

Once the contractor has been appointed to undertake specific work activities there is a contractor management procedure to follow which is undertaken by the relevant Estates and Contracting Manager. This covers the management of contractors on site and includes the requirements for inductions, signing in/out, key management, contractor records manual, and permit to work requirements, supervision, monitoring and post work checks and requirement for job/activity specific risk assessments/RAMs.

To support an effective and consistent approach across the College a separate and specific Contractor Management Policy has been created.

4.8 Construction (CDM)

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

The definition of construction work:

- The construction, alteration, conversion, fitting out, commissioning, renovation, repair, upkeep, redecoration or other maintenance, de-commissioning, demolition or dismantling of a structure;
- The preparation of an intended structure, including site clearance, exploration, investigation and excavation;
- The assembly or disassembly on site of prefabricated elements to form a structure;
- The removal of a structure, or of any product or waste resulting from demolition or dismantling of a structure;

- The installation, commissioning, maintenance, repair or removal of mechanical, electrical, gas, compressed air, hydraulic, telecommunications, computer or similar services which are normally fixed within or to a structure

Activities undertaken by contractors on behalf of CCN may fall under the CDM regulations. The specific, corporate Construction and Design Policy identifies what is in place and the various roles associated with CDM which includes CCN.

CCN also recognises that certain projects will require notification to the HSE if they meet the following criteria:

- Last longer than 30 working days and have more than 20 workers working at the same time at any point on the project, or;
- Exceed 500 person days

4.9 Dangerous Substances (DSEAR)

Dangerous substances are defined by the Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) as substances that are explosive, oxidising, extremely flammable or highly flammable.

DSEAR is concerned with the protection against risks from fire and explosion arising from dangerous substances used, present or created the workplace. The regulations apply to any substances or preparation (mixture of substances) which because of its properties or the way it is used could expose employees to harm from fires and explosions.

Where a dangerous substance is present a risk assessment is required and should be identified in the general risk assessment, COSHH and FIRE risk assessments. This is sufficient for small quantities however where large quantities are used/stored a specific DSEAR assessment will be required. The Health and Safety team liaise with the individual departments to undertake DSEAR assessments as required, advise on suitable control measures and regularly review.

4.10 Display Screen Equipment (DSE)/Computer Operation

CCN has duties within the Health and Safety (Display Screen Equipment) Regulations 1992 to employees who habitually use display screen equipment, including laptop computers as a significant part of their normal work. CCN uses an internal e-learning system, to fulfil four of the main requirements of the regulations and this is managed by the Health and Safety team.

The system ensures:

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

The provision of eyesight tests is fulfilled by First Care to cover the cost of eye tests and a contribution towards glasses for DSE use. Simply Health offers a contribution towards glasses which is claimed for upon a receipt for glasses identified for the individual.

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

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

Where there is a benefit to both employee and the business individuals may be able to work from home. This has to be authorised by the Department Head, a working at home assessment undertaken, approved and provided to the Health and Safety team and HR Services.

For further information, refer to the working at home guidance.

4.11 Driving for Work

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

The Highway Code as amended in 2022, can be viewed for free online by clicking here.

The CCN Corporate Business Travel and Subsistence Policy, identifies what needs to be in place in order to ensure that anyone driving in the course of their work is compliant and safe.

The main requirements are that they must:

- Have a drivers' licence and be eligible to drive in the United Kingdom;
- Have a licence that is appropriate for the type of vehicle they are driving;
- Not be under the influence of alcohol or drugs whilst driving for business or be expected to drive i.e. on-call;
- Have insurance that covers for business use if using their own vehicle;
- Wear a seatbelt whilst driving;
- Adhere to the speed limit both on the public highway and sites;
- Declare to their Line Manager if they are caught speeding or are convicted of any other traffic offence;
- Have a current MOT and ensure the vehicle is adequately maintained;
- Declare to their manager any medical condition or medication which may affect their ability to drive;
- Not use mobile phones or tablets for calls/texts/emails or for filming video, taking pictures or scrolling through media content. No use of a handheld mobile device should be made unless the vehicle is parked, switched off and the keys removed. The only exception is an emergency where you need to call 999 and you can justify it was not practical or safe to stop the vehicle before calling.
- Use of a hands free device is permissible when it is safe to do so, as long as the device is secured in a cradle and does not obscure your view of the road. You should be aware that any interaction with a hands-free device is still potentially distracting. Although it is not illegal to use a hands-free device, action can still be taken for driving without due care and attention and will be taken into account in the event of an accident; and
- All drivers of company vehicles are required to report any accidents

4.12 Electrical

4.12.1 Electrical Equipment at Work

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

4.12.2 Electrical Equipment

All electrical equipment in use by CCN employees is to be located and used so as to minimise the need for trailing cables and absolutely prevent power sockets becoming overloaded. To this end, staff should be mindful of the wattages indicated on equipment labels and aim not to exceed 3000w on any individual socket.

Equipment should also to be used within the limitations stated for the equipment by the manufacturer.

Electrical equipment should not be brought on site by staff or students unless otherwise agreed by line managers or relevant teaching staff as appropriate. Equipment must have checks by competent persons before use.

4.12.3 Electrical Equipment Testing (PAT/EET)

The details around the testing and inspection of electrical equipment is detailed in the Electrical Equipment Testing Policy v1.4 which reflects changes made to the 5th Edition IET Code of Practice. In the COP the term Portable Appliance Testing (PAT) has been withdrawn and replaced with EET guidance, which aims to more effectively manage electrical testing.

4.12.4 Electrical Equipment Checks and Inspections

Anyone using an item of electrical equipment must make a visual check of its condition prior to use to identify any obvious damage such as:

- Whether the item has a valid EET/PAT test label
- Plug has bent or loose pins;
- Outer sheathing of the lead not being gripped at the plug or, where it enters the appliance revealing inner coloured core wiring;
- Cables are frayed or split exposing inner wires;
- Appliance outer cover / casing has cracks or missing pieces; and
- Evidence of over-heating such as burn marks or staining

Any faulty electrical equipment, damaged leads, switches or sockets, must be reported immediately to either a Health and Safety Lead or the Estates and Facilities team, via Top Desk system, so that remedial action can be taken. Any electrical equipment considered to be faulty should be clearly marked as faulty and not be used and, if safe to do so, should be isolated by switching off. Faulty items should be taken out of use and stored where other staff and students cannot access them inadvertently.

4.12.5 Student Electrical Equipment

Students are permitted to bring mobile phones, tablets and laptops onto College premises. Their use in class to be at the discretion of teaching staff.

- Students must ensure that these portable electrical items are fully charged before being brought on site.
- On occasions where recharging on site is unavoidable, this should be done with the knowledge and supervision of staff and equipment must not be left unattended while charging. Staff should refuse permission to use chargers which are clearly damaged and in poor repair.
- E-cigarette devices are not to be re-charged on College premises at any time, either via USB connection or plug adapter.
- Electric scooters are not permitted on site and/or permitted to be recharged unless express permission is given by the relevant Head of Area. Recharging should be avoided, but if required the scooter must not be left unattended during charging.
- Students in halls of residence must have their electrical items checked/tested before use. This is in part due to the easy availability and increased risk from cheaply made non branded chargers which do not comply with CE marking /UK standards. It also reflects the prolonged presence the students will have on site to use the equipment day or night, beyond the direct oversight of staff.
- On occasions when students are authorised to bring in other electrical items in support of curriculum activities these items must be tested and visually inspected before use especially if they will be left on and unattended. These items should also be included in relevant activity risk assessments.

4.12.6 Fixed Electrical Installations

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

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

On behalf of CCN, follow a 5-year testing regime to ensure both legal compliance and the integrity of fixed electrical installations in all properties. In addition, a programme of inspection, testing and repair will reduce the likelihood of electrical accidents.

Refer to the Health, Safety and Wellbeing policy for further details.

4.13 Emergency Preparedness and Response

CCN shall identify the potential for emergency situations, and how to respond to such emergencies for each of the sites it occupies. Requirements as they apply to the college under the impending Terrorism (Protection of Premises) Bill, aka Martyn’s Law will also be taken into account. The specific CCN Business Continuity Policy identifies what needs to be in place and will include:

- Identification of potential emergency situations and accidents;
- From the risk assessment, formulating and documenting emergency procedures on a site by site basis for any likely emergencies that may arise;
- Response to emergencies and mitigation of adverse health, safety, financial, environmental, and political impacts;

- Test and review of emergency preparedness and response procedures such as evacuation and invacuation/lockdown measures;
- Provide employees and visitors information on specific emergencies; and
- Arrangements for business continuity

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

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

Examples of emergencies include:

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

4.14 Ergonomics and Manual Handling

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

The hierarchy of controls should be applied: to avoid hazardous manual handling so far as is reasonably practicable; assess any hazardous manual handling that cannot be avoided and reduce the risk of injury so far as is reasonably practicable.

Where manual handling tasks are unavoidable an assessment of the risk will be carried out and recorded when necessary, using the TILE criteria (Task, Individual, Load, and Environment). The risk assessment will identify if further measures such as specifying maximum weights to suppliers and whether mechanical aids can be used for the task and therefore reduce or eliminate the need for manual handling.

The technicians/managers/head of department are responsible for assessing the risk from manual handling. The Health and Safety team are available to assist with complex assessments.

So far as is reasonably practicable, CCN will:

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

4.15 Excavations

Excavations may be undertaken in the course of undertaking property or estates works activities on CCN properties. Such works will be considered construction activities and fall under the CDM legislation which will be managed by Estates and Facilities.

Applicable guidance such as HSG47 Avoiding Danger from Underground Services, and HSE Safety in Excavations will be used to inform relevant risk assessments.

4.16 Firearms

As part of land management and curriculum needs at Easton College, the use of firearms are required by staff and students. Such use is limited to those staff who hold appropriate firearm/shotgun certification and to students who show proof of their own firearm certification.

Students are only permitted to bring in and/or use a shotgun (as defined under the Firearms Act 1968 Section 1 (3)(a)) as part of their training. Any such use will be heavily supervised.

Handling and storage of firearms and associated ammunition is carried out in line with guidance issued by the Home Office, Police and British Association for Shooting and Conservation (BASC)Further details and specific guidance around the use of firearms is covered in ‘Easton Firearms and Shotgun Policy’

4.17 Fire Safety

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

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

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

- Where CCN are in control of the premises, they will fulfil their duty to ensure an in depth fire risk assessment is undertaken regularly by a competent person with an annual review and effective control measures implemented to mitigate fire risk;
- Where significant alterations subsequently occur to a premises, a full FRA review will be conduct to properly assess the fire safety implications of the changes.
- Site specific emergency response plans are developed and implemented which detail the procedures for implementation with information on fire evacuation plan/escape routes, fire drills, fire-fighting equipment;
- Fire drills will be planned on a termly basis for all buildings / sites in line with Gov advice for educational establishments and the outcomes logged and followed up on as required. Unplanned drills will be logged and outcomes learned from, but they will not be relied upon to meet our duties.
- Fire safety inspections and testing of fire related equipment will be carried out
- As per section 15 of the Regulatory Reform (Fire) Order 2005 (RRO) CCN has implemented an 'all staff' approach to fire marshal provision in order to better provide a sufficient number of competent individuals to assist with the evacuation of premises. Specific training in support of this is included in the staff mandatory training package.
- All employees, students, contractors and visitors are made aware of the fire arrangements in place in their work locations. Where work is undertaken in premises controlled by others, they must determine the clients' fire arrangements, and comply with those arrangements;
- Training is provided to employees on fire safety, fire investigation, and emergency procedures

4.17.1 Smoking

In support of its fire safety measures, CCN premises are designated as no smoking and employees/students/visitors are not to smoke on college premises except in designated smoking shelters with suitable bins which are provided across each CCN site. This is also required by the Health Act 2006 and Smoke-free (Premises and Enforcement) Regulations 2006. Smoking in any enclosed space is a criminal offence. It is prohibited for anyone to smoke in any buildings and is only permitted in designated smoking areas, away from any combustible materials. Smoking should only occur during official breaks.

Employees are also required not to smoke e-cigarettes in student facing areas, in offices or near other staff. This is due to the potential for e-cigarette vapour to trigger fire detection systems and the lack of conclusive information/evidence around the effects of passive exposure.

Students are similarly not permitted to use e-cigarettes inside, around entrances or anywhere else that may cause annoyance. The charging of e-cigarette devices is not permitted on site (see 4.12.5) Designated areas for E-cigarettes/vaping have been defined and their use encouraged across CCN sites.

4.18 First Aid Arrangements

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

CCN ensure employees and students receive immediate attention if they are injured or taken ill at the college. CCN include the provision of first aid to all non-employees that may reasonably be affected by its undertaking.

CCN ensures that:

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

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

In general terms a needs assessment identifies that with less than 25 employees an appointed person is required, with 25-50 there should be employees trained to the Emergency First Aid at Work level and with more than 50 employees First Aid at Work training. As well as ensuring there are adequately trained first aiders the college also appoints nurses to provide support for anyone taken ill whilst at college.

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

This ensures that the following can be arranged:

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

Any accidents, however minor, or ill health occurring must be notified on the internal electronic incident reporting system.

4.19 Food Safety

CCN recognises the significance of the requirements for food safety within both the educational delivery setting and the commercial food outlets. Understanding that inadequate awareness of good hygiene practice in the preparation of food can lead to the spread of a number of diseases, predominantly the various types of food poisoning.

A range of legislation specifically applies to catering establishments. The Workplace (Health, Safety and Welfare) Regulations 1992 give rise to specific requirements in relation to standards for hygiene and cleanliness in areas where food is prepared and eaten.

The Control of Substances Hazardous to Health (COSHH) Regulations applies in the context of food safety, bacterial and/or viral agents could certainly be considered as

'substances hazardous to health'. Examples would include detergents, disinfectants, cleaning materials, chemicals used in food tests, yeasts and yoghurt bacteria.

The Provision and Use of Work Equipment Regulations 1992 and Gas Safety (Installation and Use) Regulations 1998 applies to equipment in the catering setting. Pressure cookers are subject to specific regulations, namely the Pressure Systems and Transportable Gas Containers Regulations 1988, all requiring specific inspection, servicing and maintenance regimes.

Also, the Food Safety Act 1990, and subsequent regulations, covers all the operations involved in selling, possessing for sale, delivering, preparing, labelling, storing, importing and exporting food.

CCN ensures that all departments involved in catering related activities implements a food safety management system based on the principles of Hazard Analysis and Critical Control Point (HACCP). Employees involved in the HACCP management have a minimum of level 3 Food Hygiene certificate.

The system ensures that potential food hazards are identified and introduce procedures to make sure those hazards are removed or reduced to an acceptable level. Risk assessment are also in place to ensure the above legislation is applied.

The Health and Safety team provides advice and undertakes audits and inspections to ensure the HACCP procedures are being implemented.

Food safety officers from the local authority regularly inspect food businesses to check they follow food hygiene law so that the food is safe to eat. At the inspection, the officer checks the following three elements: how hygienically the food is handled – how it is prepared, cooked, re-heated, cooled and stored; the physical condition of the business – including cleanliness, layout, lighting, ventilation, pest control and other facilities; how the business manages ways of keeping food safe, looking at processes, training and systems to ensure good hygiene is maintained. The hygiene standards found at the time of inspection are then rated on a scale 0 to 5 (5 meaning the hygiene standards are very good and fully comply with the law.

4.20 Gas Safety

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

CCN understands the importance of ensuring the maintenance and statutory testing of gas appliances and is manged by Estates and Facilities. The gas servicing undertaken by a third-party specialist. Currently, their service is broken down into a major and a minor on each appliance per year. All gas works are in accordance with gas safe, IGE/UP/1and2 and is the statutory landlord's gas safety certificate.

4.20.1 The Major Service

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

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

4.20.2 The Minor Service

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

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

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

4.21 Hair and Beauty

CCN undertakes both commercial and curriculum-based hair and beauty activities. These activities will involve use of cosmetics as defined under (EC) No 1223/2009 and also substances which fall under the COSHH regulations. Whilst cosmetic products may not directly fall under COSHH, the manner in which they are used may require COSHH management. E.g Tanning, or body paint products being sprayed creating a risk through inhalation.

Relevant health and safety legislation and industry best practice will be followed to protect staff, students, members of the public and anyone else affected by its activities.

Department Heads are responsible for ensuring that the activity specific risk assessments are undertaken and implemented. Utilising association standards as a guide for identifying suitable control measures.

4.22 Hazard Control – Risk Assessment and Method Statements

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

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

Hazard identification and risk assessment takes account of:

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

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

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

Corporate Risk Assessment templates are available for Young Persons (employed by CCN), Expectant Mothers, Lone Working, Manual Handling and Work-Related Stress. The Health and Safety team are able to advise and review risk assessments and assist with specialist assessments. These are held on O365 in Health and Safety Connect.

Also, Health and Safety Leads should ensure that activity-based risk assessments are in place for their areas of work and ensure operational controls are implemented to manage health and safety risks to an acceptable level for operational areas and activities. In determining the appropriate control measures the hierarchy of control has to be applied which is to:

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

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

Where relevant, method statements or procedures for each main activity should be undertaken by relevant qualified staff with support and oversight by Health and Safety Leads and implemented ensuring a description of a step by step approach on how a job is to be carried out in a safe manner and without risks to health. It includes all the risks identified in the risk assessment and the measures needed to control those risks.

General control measures shall include: Maintenance and repair of facilities, machinery and equipment to prevent unsafe conditions from developing; Housekeeping and maintenance of clear walkways; Traffic management; Provision and maintenance of workstations; Maintenance of the thermal environment; Maintenance of the ventilation systems and electrical safety systems; Maintenance of emergency plans; Health

programmes (medical surveillance programmes); Training and awareness programmes relating to the use of particular controls (e.g. permit to work systems).

It is the responsibility of Heads of Area with support from Health and Safety Leads and Managers to ensure that suitable risk assessments are in place for all potentially hazardous activities and where this is a foreseeable risk, ensuring that effective control measures have been implemented. The assessments should be available to all who undertake the activities.

Risk assessments should be reviewed annually or if there are any significant changes. Once reviewed and updated the old ones must be archived so that it is clear what was in place at certain times.

Refer to the Management of Contractors policy for information on risk assessments and method statements provided by contractors for their undertakings.

4.23 Housekeeping

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

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

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

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

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

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

4.24 Hot Works

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

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

Estates and Facilities, or appointed contractors may carry out hot works as part of their work activities for and on behalf of CCN. CCN may also undertake hot works as part of the curriculum delivery. A suitable task specific risk assessment and method statement should identify hazards and ensure that suitable control measures are identified. Unless hot work is carried out in an area designated for hot works, local isolation of fire detectors will be required. This must be carefully controlled via a permit to work system, and isolations put in place for the shortest periods required. Where contractors will under take hot works, it is the Contracting Managers / Responsible Persons responsibility to implement control measures as part of their oversight of the works and to ensure suitable management of local fire detection isolations is carried out.

Refer to the permit to work guidance as to when certain hot works requires a permit.

4.25 Infection Control

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

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

The Infection Control policy identifies what needs to be in place in order to ensure that:

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

- Review practices and share best practice both internally and externally, and keep up to date with changes in legislation to continually improve infection control.

4.26 Legionella

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

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

The Health, Safety and Wellbeing policy identifies what needs to be in place in order to comply with the legal duties. Estates and Facilities on behalf of CCN will:

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

4.27 Lone Working/Shift Working

4.27.1 Lone Working

Lone workers are defined by the HSE as "someone who works by themselves without close or direct supervision". Further to this CCN will consider lone working controls to be applicable to staff who may not be totally isolated from other people, but rather are the only member of staff in a given environment.

Lone working should be avoided where it is possible to do so, however some tasks, especially in relation to farming at Easton, may require staff to be working well away from other colleagues.

Where work activities require employees to work alone managers should ensure the risks to these employees are assessed and adequate control measures in place including regular communication and monitoring, emergency response and incident reporting. CCN will undertake a lone worker risk assessment if identified as necessary which considers the likelihood of injury and the possible consequences.

The Managers / Heads of Department are responsible for carrying out a lone working risk assessment and for directly involving the lone worker.

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

Refer to the new separate Lone Working Policy for more detailed information.

4.27.2 Shift/Night Working

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

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

4.28 Noise at Work

CCN will assess all processes and operations carried out so as to ensure that the requirements of the Control of Noise at Work Regulation 2005 are complied with. The Health and Safety team will undertake noise assessments and where the noise levels exceed the actions levels specified in the regulations, appropriate arrangements will be put in place to ensure that no employee or others affected by the work activity are subjected to conditions which could cause harm. CCN will undertake risk assessments in academic areas where noise levels may be potentially high such as workshops, music rooms and kitchens.

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

Hearing protection will be made available to all employees working in areas where the average noise levels of 80dB (first action level). Hearing protection will be mandatory when the average noise levels exceed 85dB (second action level). Areas with high noise levels will be clearly identified as hearing protection zones with mandatory hearing protection warning signs displayed.

This specifically relates to noise created by work activities. Monitoring is undertaken by the occupational health provider as identified by the assessment process.

4.29 Occupational Health Management

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

To ensure that potential employees are fit for the job they are applying for and to identify any pre-existing medical conditions which may need managing, applicants are required to complete a pre-employment medical questionnaire. The completed forms are vetted by the Occupational Health provider.

The Health and Safety Lead/Manager/Head of Department will provide information to employees working in the areas where there is an increased risk of exposure to a hazardous chemical substance, biological or physical agents.

CCN has appointed an external occupational health provider to fulfil the requirements for health surveillance, medical reviews, counselling etc.

Health Surveillance programmes are in place for proactive monitoring and reactive assessment including audiometry, hearing and lung function tests and blood and urine tests as appropriate.

The Health and Safety team will provide advice and support and ensure control measures are identified to reduce exposure.

All occupational health records are kept with , HR Services in the employee's individual personnel record; Occupational health records are kept for 40 years from the date of the last entry.

4.30 Permits to Work

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

The Permit to Work guidance and procedures identifies what needs to be in place in order to manage particularly hazardous activities and the permit to work procedure and permits identify how the system is undertaken and implemented.

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

Permits to work are used for:

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

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

4.31 Personal Protective Equipment (PPE) and Clothing

CCN recognises the Personal Protective Equipment at Work Regulations 1992 (As amended 2022) applies to equipment that will protect the user against health and safety risks at work.

In respect of these obligations and commitments, CCN will:

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

Any employees not complying with a requirement to use PPE will be subject to disciplinary procedures.

4.32 Product Safety

CCN recognises The General Product Safety Regulations 2005 (GPSR) and The Supply of Machinery (Safety) Regulations 2008 (as amended) and identifies the importance of purchasing suitable and safe machinery. A machine is normally regarded as being a piece of equipment which has moving parts and, usually, some kind of drive unit.

To ensure compliance with the machinery directive departments must ensure that it is safe when supplied, is CE and/or UKCA marked, comes with a declaration of conformity and user instructions.

The Health and Safety team can be consulted for advice and guidance on product safety matters.

4.33 Radiation

CCN identifies the need to comply with the Ionising Radiations Regulations 2017 and Radioactive Substances Act 1993 to ensure that exposure to ionising radiation arising from work and teaching activities are kept to as low as reasonably practicable and does not exceed the dose limits specified within the Regulations.

There are two types of radiation: non-ionising radiation and ionising radiation. If uncontrolled, both can cause irreversible damage to human tissue. Ionising radiation is considered to be the most dangerous because, if not handled correctly, it causes damage at very low doses.

CCN stores, handles and uses a variety of sources of ionising radiation for teaching purposes. The sources of ionising radiation used for work and teaching activities have been registered with the Health and Safety Executive. CCN appoints in writing a Radiation Protection Adviser (RPA).

Furthermore, CCN sets out the management of Radiation sources via the procedure document ‘Ionising Radiations and Radioactive Substances Standard Operating Procedures and Contingency Plans’ This document also identifies the role of Radiation Protection Supervisor (RPS) who has direct responsibility for the safe management and administration of radiation sources on CCN sites.

Technicians/Health and Safety Leads/Managers/Heads of Department apply the CLEAPSS guidance to ensure compliance with the relevant legislation including ensuring that a risk assessment with suitable controls measures is implemented. Specific attention is paid to the protection of women of childbearing age. There are also specific maximum exposure limits for under the age of 18.

The Health and Safety team will provide support and advice and liaise with the RPA and RPS

4.34 Sports/Recreation

CCN undertake both commercial and curriculum-based sports and recreation activities. All fall within the general remit of health and safety legislation to protect staff, students, members of the public and anyone else affected by its activities.

Department Heads are responsible for ensuring that the activity specific risk assessments are undertaken and implemented. Utilising association standards as a guide for identifying suitable control measures.

4.35 Stress Management

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

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

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

How well individuals handle and communicate stress and anxiety will differ greatly and line managers may not always be aware of how a member of their team is coping. However, where an employee formally states that they are being adversely affected by work related stress CCN will need to actively respond to investigate and mitigate the causes of the workplace stress.

Refer to the specific corporate Sickness and Absence policy which identifies how CCN proactively identifies and manages stressors as well as the process for managers and employees in stress related cases which is set out in the Promoting Wellbeing and Resilience policy.

The Health and Safety team can support local managers with producing reactive and proactive individual stress risk assessments which follow the six management standards as set out by the HSE.

4.36 Vibration

CCN recognise that vibration at work is a health and safety issue and acknowledge the importance of identifying and reducing workplace vibration to an acceptable level.

CCN identifies and manages causes of workplace vibration in order to prevent personal injury caused by excessive exposure to vibrating equipment of all types as required by The Control of Vibration at Work Regulations 2005.

It is the responsibility of the Health and Safety Lead/Manager/Department Head to ensure that a risk assessment is undertaken for the task requiring the use of vibrating equipment or machinery. The Health and Safety team can offer advice and support for these assessments.

Hand Arm Vibration Syndrome and Whole-Body Vibration Syndrome are widespread industrial diseases. The Health and Safety Executive (HSE) estimate that over 2 million people are exposed to high levels of vibration and are at risk from developing an injury or permanent disability as a result.

Employees may be at risk if they regularly use hand-held or hand guided power tools and machines such as:

- Sanders, grinders, disc cutters;
- Hammer drills;
- Chipping hammers;
- Chainsaws, brush cutters, hedge trimmers; and
- Powered mowers

Identifying signs and symptoms at an early stage is important. The symptoms include any combination of:

- Tingling and numbness in the fingers;
- Not being able to feel things properly;
- Loss of strength in the hands; and
- Fingers going white (blanching) and becoming red and painful on recovery (particularly in the cold and wet, and probably only in the tips at first)

These effects can severely limit the jobs an affected person is able to do, as well as many family and social activities.

If an employee has any of the above symptoms, they should visit their GP as soon as possible and report to the Health and Safety team.

The Health and Safety team will monitor the use of vibrating tools used across the business and assess whether monitoring is required.

4.37 Violence and Aggression

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

Any incident relating to violence and aggression should be reported to the site Security team, Line Manager and recorded on the incident reporting system and Duty Principle Log.

4.38 Welfare Facilities

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

This includes aspects of the workplace that can affect employee's health and safety, including temperature, ventilation, lighting and workspace as well as defining standards for accommodation for clothing, facilities for changing, rest and eating areas, and washing and sanitary facilities.

4.38.1 Workspace

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

4.38.2 Temperature

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

4.38.3 Ventilation

Regulation 6 requires that effective and suitable measures are taken to ensure that enclosed workplaces are adequately ventilated and "stale air or air that is hot or humid" is replaced at a reasonable rate. "Ventilation" includes both openable windows and mechanical systems, and the legal requirements include avoidance of unpleasant smells and exhaust fumes, where possible. The main method of ventilation within the premises is by openable windows and extractor fans for internal spaces without windows (toilets). Where it is felt necessary CO2 monitors may also be used to indicate local air quality and air exchange rates.

4.38.4 Sanitary and Washing Facilities

CCN provides, in accordance with our legal responsibilities, suitable and adequately maintained sanitary and washing facilities which provide hot and cold running water within our premises for use by students, employees, visitors and contractors. The location of these facilities will, wherever possible, take into account accessibility needs. All sanitary and washing facilities are regularly cleaned and maintained and have adequate soap and hand drying facilities. All employees and students have a responsibility to use the facilities correctly and to assist in the maintenance of good standards of cleanliness by being tidy and leaving the facilities in a suitable condition after usage. Any inadequacies with the facilities noted by employees should be reported.

4.38.5 Lighting

The general need is for adequate lighting, preferably by natural light sources, for the nature of the work being undertaken. Lighting should be sufficient to enable people to work, use facilities without experiencing eyestrain, and safely move from place to place.

Stairs should be kept well-lit and the lighting should not cast shadows over the main part of the treads. Outdoor traffic routes used by pedestrians should be adequately lit after dark.

Lights and light fittings must be selected, positioned and maintained, so that they avoid annoying glare and do not cause a hazard (e.g. electrical, fire, radiation or collision).

Lights and windows should be cleaned, repaired or replaced, as necessary, before the level of lighting becomes insufficient. Avoid obscuring light by placing items in front of lights and windows (e.g. stacked goods). Light switches should be positioned so that they may be found and used easily and without risk.

Emergency lighting should be provided in workrooms where sudden loss of light would present a serious risk, for example if a potentially hazardous process needs to be made safe, and this cannot be done safely without lighting, or if there is no natural lighting.

4.38.6 Roadways/Walkways

Vehicles and pedestrians should be kept separated. There should be clear walkways around the campus with appropriate crossing points where pedestrian and vehicle routes meet. Where necessary, barriers or rails should be provided to prevent pedestrians crossing at particularly dangerous points and to help guide them to designated crossing places.

Further details can be found in the Workplace Transport section.

4.38.7 Snow and Ice

In order to comply with the Workplace Health, Safety and Welfare regulations 1992, CCN shall operate procedures which prevent and/or minimise the detrimental effects of snow and ice on external pedestrian and vehicular routes. Such procedures will typically involve the application of brown rock salt (halite) AKA ‘grit’ or more likely white marine salt (which is less corrosive and messy)

It is understood that any salt needs time to take effect and starts to lose its thawing properties once temperatures drop below approx. minus 6 deg C.

When and where salt/grit will be applied are determined by;

- Anticipated weather conditions and temperature checks. Typically grit/salt should be applied when temperatures will drop below 2 deg C
- Routes/areas which are heavily used by either pedestrians or vehicles
- Routes which connect main buildings
- Pedestrian crossings and routes leading to crossings
- Location of steps and access ramps.
- Routes which, while potentially less used, provide the only available route between two locations.
- Well used routes which are on slopes

Currently, assistance will be given by local authority gritting vehicles to roadways and carparks around Ipswich Road site.

Staff carrying out salting and clearing duties will be given suitable equipment, clothing and PPE and work to agreed risk assessments.

Gritting plans will define which areas on CCN sites fall under these criteria and will be treated.

4.38.8 Window Safety

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

Within student accommodation there are three broad categories of falls from windows to consider:

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

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

Windows

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

Risk Assessment

To adequately manage the risk of falls from windows, CCN will assess the premises and risk to service users. This includes assessing the risk that furniture, or other items, may enable them to access windows which might otherwise be inaccessible. Suitable controls may include fitting adequate window restrictors to bedrooms, studios, kitchens and communal areas to prevent accidental falls; fitting an adequate screen or barrier to prevent service user access to a window.

Inspections

Periodic visual and in-room inspection programmes are completed and documented with appropriate safety signage displayed. Daily visual inspections will be completed by the caretakers.

Maintenance

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

Doors and Gates

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

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

- A sensitive edge, or other suitable detector, and associated trip device to stop, or reverse, the motion of the door or gate when obstructed;

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

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

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

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

4.38.9 Facilities for rest and to eat meals

CCN provides facilities for staff taking a break and eating meals. Facilities include provision for preparing or obtaining a hot drink such as kettle/hot water boiler or canteen.

4.39 Women's Health

4.39.1 Woman of Childbearing Age

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

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

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

4.39.2 New and Expectant Mothers

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

It is the responsibility of the Line Manager to undertake a risk assessment and regularly review it with the individual to take account of changing circumstances. A college

expectant mothers' template risk assessment with guidance can be used as a basis for the assessment however individual circumstances must be considered and controlled.

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

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

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

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

4.39.3 Menopause

CCN recognises that many women experience menopausal symptoms at some stage and can transition over several years. Typically, between age 45 and 55. The perimenopause' is the phase leading up to menopause, when a woman's hormone balance starts to change. For some women this can start as early as their twenties or as late as their forties.

The menopause can cause a wide range of physical and psychological symptoms that can last for several years and may be felt to varying degrees.

CCN supports women through this time of change by undertaking specific menopause risk assessments as required, workshops are made available to managers and women to raise awareness and identify appropriate adjustments. There is also a senior leader champion.

4.40 Work Equipment

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

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

With the exception of small hand tools (non-powered) employees should not use their own equipment except in exceptional circumstances and this must be agreed in writing by heads of department with evidence that it is suitable and fit for purpose with appropriate certification and maintenance records.

The Estates and Facilities team are responsible for the following planned preventative maintenance (PPM) activities:

- Periodic electrical testing;
- Emergency lighting tests;
- Fire alarm testing;
- Local Exhaust Ventilation (LEV);
- Pressure Vessels;
- Lifting equipment; and
- Air Handling inspections

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

Technicians/Managers/Head of Department are responsible for visually checking that the engineering controls are in good working order on a weekly basis. Suitably recorded and any faults, damage or deterioration must be reported immediately to the Estates and Facilities team.

4.41 Work at Height

CCN recognises that Work at Height commonly occurs throughout the business in many different scenarios. CCN will implement measures to prevent injuries to employees from falling from height which is a requirement under the Work at Height Regulations 2005. Working at height is working where a person could be injured by falling. This may include when standing at ground level but near an opening/hole/drop.

Work at Height regulations set out what needs to be in place in order to:

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

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

Working at height assessments will be undertaken by Technicians/Health and Safety Leads/Managers/Head of Department where required. Additional support can be obtained from the Estates and Facilities and Health and Safety teams.

Statutory inspections are undertaken as part of the Estates and Facilities maintenance regime. Individuals using equipment must undertake a visual inspection prior to use.

Work at height should not be undertaken unless the employee is trained and competent to use the specific work at height equipment.

4.42 Workplace Transport

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

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

The Workplace (Health, Safety and Welfare) Regulations 1992 requires that traffic routes are maintained and controlled, adequate segregation of vehicles and pedestrians, clear loading bays, adequate signage and good condition of floors and traffic routes. A workplace transport plan for each campus assesses and monitors the adequacy of these measures.

Workplace transport covers the use of all types of vehicles and powered mobile work equipment in workplaces but does not include vehicles travelling on the public highway.

The driving for work section earlier and the Business Travel and Subsistence policy provides information regarding driving on the public highways.

Each site should ensure that:

- A workplace transport plan is in place which incorporates a risk assessment identifying the hazards which considers the vehicles; the routes and roadways used by vehicles; what is required by the drivers, pedestrians and people in and around vehicles any vehicular movements associated with workplace transport and ensuring the necessary control measures are in place, monitored and reviewed.
- Arrangements are in place for workplace transport activities (this includes student buses, taxis, bin lorries, deliveries, contractor vehicles)

4.43 Wellbeing

CCN recognises that FE providers need healthy and well-motivated workers if they are to deliver high-quality services. Effectively managing occupational health and Wellbeing is key to achieving this.

This is high on the agenda of the HSE and Government. The Health, Work and Well-being (HWWB) strategy, is a joint initiative between the Department of Health, Department for Work and Pensions and the Health and Safety Executive promoting organisations to invest in their employee wellbeing.

Experiencing wellbeing means that an individual feels good; is functioning at an optimal level psychologically, socially and physically; can fulfil their potential and flourish; work productively; and generally, have a positive impact on their surroundings, whether at work, home or in the community. Wellbeing can also be partly defined as the absence of stress (see 4.35)

CCN have appointed an occupational health provider which provides both reactive and proactive support. All employees also have additional benefits through Goodshape including Mental Health resources. In addition, CCN has signed up to the Association of Colleges Mental health Charter which defines several key criteria to be met.

Wherever possible the Health and Safety team collaborates with other CCN departments to organise and participate in Wellbeing initiatives and ensures that the subject is given due consideration and resource.

The college has a number of trained Mental Health First Aiders and will seek to deploy them in the most effective ways to support staff and students.

CCN ensures wherever possible that employees come to work and have:

- a conducive environment to work in
- suitable equipment so that they can fulfil their tasks
- clarity of role and responsibilities
- clear procedures and processes to fulfil their work responsibilities
- the necessary training to be competent to do their job
- regular breaks and clear boundaries of working times
- reasonable expectations without excessive pressure
- support if they are struggling
- development opportunities based on their abilities

4.44 Young Persons: At Work and Work Experience, Apprenticeships and Field Trips

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

- To assess risks to all young people under 18 years of age, before they start work. Specific factors to take into account include:
- The fitting-out and layout of the workplace and the particular site where they will work;
- The nature of any physical, biological and chemical agents they will be exposed to, for how long and to what extent;
- What types of work equipment will be used and how this will be handled;
- How the work and processes involved are organised;
- Level of health and safety training given to young people;
- Risks from the particular agents, processes and work (including noise, vibration, heat)

  Additional training, supervision and mentoring should be provided to take into account their inexperience and limited life skills
- To ensure the risk assessment takes into account their psychological or physical immaturity, inexperience, and lack of awareness of existing or potential risks; and
- To introduce control measures to eliminate or minimise the risks, so far as is reasonably practicable

4.44.1 Industry Placements and Work Experience

It is commonly a course requirement for students from CCN to attend work experience with external organisations away from their respective campus.

It might also be decided that a student would benefit from attending voluntary work experience that is not a mandatory course requirement.

These periods of work experience may be for just a single day or for extended periods of up to the full academic year.

The Health and Safety (Training for Employment) Regulations 1990 identifies that the placement holder has the primary duty of care for the student (employee). The student also has a responsibility for their own safety and must follow the rules and raise any concerns with the employee and/or tutor.

However, as the education or training provider CCN must satisfy themselves that an employer has assessed the associated risks to workers under 18 on their premises and has suitable and sufficient risk management arrangements in place.

Any checks must be in proportion with the risk within that environment. For low risk environments, assurance may be gained through use of a questionnaire if deemed appropriate. A physical inspection by education providers is considered appropriate for medium and high-risk work environments.

The Health and Safety team will advise and assist CCN in relation to the health and safety aspects of work placements. They will also undertake pre-employment checks and undertake due diligence to check that the employer is managing health and safety and will ensure the safety of the student. As well as providing training and supporting the work placement assessors.

A detailed overview of the approach to work placement checks is set out in documents 'H&S Policy for Work Placement Checks' and 'H&S Procedure for Work Placement Checks

4.44.2 Apprentices

Students are typically already employed as Apprentices with employers they have established a relationship with. The employer has the primary duty of care. However, CCN also has a moral duty to protect the student. Due diligence checks should be undertaken to provide re-assurance that the student is protected at the workplace, that Employers Liability Insurance is in place and that they are aware how to raise issues and concerns with the employer and college.

4.44.3 Field Trips

CCN identifies that it has a duty to ensure the safety of students whilst on field trips. The trip organiser ensures that adequate checks and measures are undertaken in line with the College's Field Trips, Visits and Extra-Mural Policy.

Part 5: Health and Safety Information, Instruction and Training

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

CCN employees are made aware of general health and safety information relevant to working for the organisation and aware of the safety culture as well as the importance attached to health and safety by the Board and Senior Management Team. This takes the form of formal training courses, information provided in the form of procedures and team talks as well as direct instruction in the form of briefings and mentoring.

Health and Safety information is available online via the Health and Safety Connect in SharePoint portal and has links to the Health and Safety policy, procedures, risk assessments and guidance.

The health and safety statement of intent is available at all sites demonstrating CCN's commitment to manage health and safety and aligns with the 'Ways of Working'. As well as the health and safety law poster that provides a summary of the key health and safety requirements required by law.

Safety information is also displayed on notice boards. The Health and Safety team manage a queries/concerns email account to support and advise staff and managers.

Health and safety training for CCN employees enables them to fully understand the requirements and demands of their work and the arrangements for ensuring their health and safety, emergency procedures, first aid/accident reporting and the arrangements for health or safety assistance. Their health and safety responsibilities are outlined in their job description.

All new employees receive an Induction which covers:

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

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

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

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

A health and safety training needs analysis identifies the training requirements by job role is undertaken by the Health and Safety team and is periodically reviewed in conjunction with HR Services. Managers review training needs at the time of annual employee's appraisals and following any changes in work practices, changes in an individual's capability, or changes in technology or equipment.

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

5.1 Temporary and Casual Employees Training

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

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

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

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

Part 6: Health and Safety Communication

CCN recognises that a good health and safety culture can only be built with effective communication. Health and Safety is communicated across the business at all levels including updates at Board level, at CLT and CMT managers' meetings, Health and Safety Group (committee) meetings, site visits, email updates, safety alerts, newsletters, workshops and other initiatives and events.

Health and safety advice and information is available from the Health and Safety team.

Refer to the Contractor Management policy for details of information and induction provided to contractors.

CCN recognises that consulting employees or their representatives about matters to do with their safety is good management practice, as well as being a requirement under health and safety law.

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

- The Safety Representatives and Safety Committees Regulations 1997 (as amended) and;
- The Health and Safety (Consultation with Employees) Regulations 1996 (as amended)

The Safety Representatives and Safety Committees Regulations 1997 will apply as the trade union has appointed, safety representatives; and requires CCN to consult with safety representatives with a view to making and maintenance of arrangements which will enable CCN and their employees to co-operate effectively in promoting and developing measures to ensure the health and safety at work of the employees, and in checking the effectiveness of such measures. Safety representatives are required to represent the employees in those consultations.

CCN recognises its duty to consult with the trade Unions health and safety representatives on health and safety matters and currently works with any unions who have representatives working for the college including Unison and UCU.

There are a number of levels of health and safety meetings across the business these include the following:

6.1 Health and Safety Group Meetings (Consultation)

The Group Health and Safety (committee) is chaired by the Deputy CEO or the Deputy Principal of CCN with attendance from HR Services, Estates and Facilities and the Health and Safety team. As well as representation from unions and employees. The committee meets quarterly.

The role of the Group is to:

- Review the health and safety policy and annual plan and any other associated topic specific policies;
- Ensure that resource is being allocated to ensure the policies are implemented across the business and reflected in localised procedures;
- Review incident and sickness absence data and identify solutions for reduction;
- Consider and agree solutions for health and safety issues; and
- Consider the impact of legal changes on the business

6.2 Staff Forum

There is a Staff Forum for Norwich, Easton and Paston, which is a gathering of nominated staff representatives and senior management including the Principal/CEO, Deputy CEO and HR Services. The forum comes together to discuss operational issues and understand the Health and Safety strategy. There is the opportunity to discuss health and safety related subjects and issues. These meetings are held, as a minimum, quarterly.

The role of the Group:

CCN believes that good employee relations are best achieved if all employees are informed and offered opportunities for discussion on a regular basis about matters significantly affecting their employment, including their health, safety and wellbeing.

The Staff Forum aims to provide a forum in which senior managers and employees' representatives (including Union representation) can meet regularly to discuss wide

matters of common interest and concern, site-based concerns and, where problems or disagreements exist, to seek mutually agreeable solutions. Health, Safety and Wellbeing is always an agenda item.

6.3 Health and Safety Lead Forum

The Health and Safety Lead forum is facilitated by the Health and Safety team with a consistent approach to topics and agenda. The regular meetings (at least termly) are attended by safety leads and other interested parties.

The role of the Group is to:

- Ensure area specific health and safety issues are raised and addressed;
- Share good practice;
- To discuss health, safety and wellbeing updates:
- Receive training and workshops to enable delivery of the Health and Safety lead role and
- To agree issues to be taken to the Health and Safety Group by the nominated representative from the forum

Part 7: Legal Requirements and Updates

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

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

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

Part 8: Monitoring the Effectiveness of the Policy and Arrangements

It is paramount that the policy and arrangements detailed in this document are implemented throughout the business. Monitoring will identify strengths, good practice, weaknesses and opportunities for continuous improvement.

Monitoring will take the form of reviewing outcomes of internal and external audits, site inspections, walkabouts, reviews of documentation and benchmarking.

8.1 Inspections

CCN will implement a series of internal site inspections which will be undertaken regularly according to an inspection plan. These will be reviewed on a regular basis. The

outcomes, scoring and actions are reviewed by Directors, Managers, Health and Safety team on a monthly basis and appropriate action undertaken.

Also, Hazard Spotting site inspections 'walkabouts' are undertaken by the Health and Safety Leads and Health and Safety team, to identify strengths and weaknesses' and ensure that non-compliances are identified and rectified. The inspections are recorded formally on the 'Inspection check sheet' which will identify actions required and will be provided to the department and any other interested parties i.e. compliance, estates.

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

8.2 Audit

CCN will implement planned internal audits and reviews by the Health and Safety team which will include the scope of the management system and its application to ensure the effectiveness of the arrangements, compliance with Health and Safety legislation and meets the requirements of HSG65. It will encompass all areas of the buisness . There will be a selection of topics or hazards based audits to focus on i.e. Catering, Manual Handling, Work at Height, Machinery safety.

The audit programme includes:

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

An external audit of the Health and Safety Mangement system will be undertaken once the three year Health and Safety strategy is implemented. Opportunities for continuous improvement will also be identified and the need for any changes to the management system.

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

8.3 Reviews

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

An annual health and safety report will be provided via the Business Committee for the Board of Governors which shall consider the: progress against the current Health and

Safety strategy; results of internal audits and site inspections; results of consultations; communication from external interested parties; Health and Safety performance; status of incident investigations; follow-up from previous management reviews; changing circumstances; legal updates, recommendations for improvement and highlight the focus for the forthcoming year.

The Health and Safety team support the procurement team to review and re-tender for contracts where safety is a consideration.

8.3.1 Continuous Improvement

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

Other areas will also be considered to include new technology; good practice from other organisations; suggestions from employees; external parties such as insurers; knowledge and understanding of health and safety issues; new or improved materials available; changes to the workforce competence or capability.

Part 9: Setting Objectives

9.1 Health and Safety Strategy Plan

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

An annual report is a review of the strategy and plan and provides the board with an evaluation of the current status and achievements.

Monitoring and measuring performance is undertaken against the following areas:

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

Part 10: Document Control

10.1 Document and Record Control

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

Health and Safety documents are stored electronically within Office365, Health and Safety connect. The folder structure is: Health and Safety Policy, Risk Assessments and Method Statements, Health and Safety Training and Information, Accidents and Near Misses, Inspections and Audits, Legal Updates, Health and Safety Strategy and Plan, Hazard Controls, Site Safety, Employee Wellbeing, Emergency preparedness and response, Student safety and FAQ's

10.2 Storing Documents

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

All current documents relevant for business process are held on Office365, Health and Safety connect site, accessible to all employees.

10.3 Archiving

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

Part 11: Legal References

The Health and Safety at Work etc. Act 1974 (HSW Act);

The Management of Health and Safety at Work Regulations 1999;

Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR);

The Control of Asbestos at Work Regulations 2012 (amended December 2013);

The Construction (Design and Management) Regulations 2015 (CDM)

Confined Spaces Regulations 1997;

The Health and Safety (Consultation with Employees) Regulations 1996 (as amended);

The Control of Substances Hazardous to Health Regulations 2002 (COSHH);

The Data Protection Act 2018;

Health and Safety (Display Screen Equipment) Regulations 1992;

Road Traffic Act 1988 (and subsequent amendments);

The Electricity at Work Regulations 1989;

Manual Handling Operations Regulations 1992 (as amended);

Regulatory Reform (Fire Safety) Order 2005 and Fire (Scotland) Act 2005;

Health and Safety (First-Aid) Regulations 1981;

The Gas Safety (Installation and Use) Regulations 1998;

The Workplace (Health, Safety and Welfare) Regulations 1992;

Control of Noise at Work Regulation 2005;

The Personal Protective Equipment at Work Regulations 1992 (As amended 2002);

The Control of Vibration at Work Regulations 2005;

Provision and Use of Work Equipment (PUWER) 1998;

Legionnaires Disease L8 ACOP (Legislative requirements covered under HSW Act, Management Regulations and COSHH)

Lifting Operations and Lifting Equipment Regulations (LOLER) 1998;

Pressure Systems Safety Regulations 2000;

Work at Height Regulations 2005;

Supply of Machinery (Safety) Regulations 2008

The Health and Safety (Training for Employment) Regulations

Ionising Radiations Regulations 2017

Modern Slavery Act 2015

Radioactive Substances Act 1993

The General Product Safety Regulations 2005 (GPSR)

The Supply of Machinery (Safety) Regulations 2008

Food Safety Act 1990

EU Regulations for the Registration, Evaluation, Authorisation and restriction of Chemicals (REACH)

Contact

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Estates and Facilities team: EstatesAndFacilitiesTeam@nes.org.uk

Equal Opportunities Statement

This policy and procedure has been assessed against the nine protected characteristics outlined in the Equality Act 2010 and no apparent disadvantage to equal opportunities has been determined.

If you have any comments or suggestions in relation to equal opportunities of this policy or procedure please contact the policy holder.