

CRH Wethersfield Accommodation Centre	
Health and Safety Policy - Arrangements	
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1.0	June 2023	June 2024		Initial HS arrangements at the time of mobilisation
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MAIN SOURCE DOCUMENTATION

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- HSG 65 Managing for Health and Safety
- CRH Corporate Health and Safety Policies

KEY PERFORMANCE INDICATORS

- Accident/Riddor data
- Annual Safety Improvement Plan
- Audits of the HS Management System

SCOPE

- All Employees

Introduction. Clearsprings Ready Homes (CRH) work activities can expose CRH employees and others (primarily those we provide accommodation for during their asylum seeking process) to a wide variety of hazards and situations that may present a risk to their health and safety. This includes the Wethersfield Accommodation Centre, known as “the Centre”. The purpose of this section of the health and safety policy is to identify the arrangements that are in place to manage those hazards and situations.

The arrangements will ensure that CRH are compliant with current legal requirements for health, safety and welfare at work and protecting the health and safety of employees and other persons who may be affected by CRH work activities. In addition, the arrangements will assist in meeting the requirements for an effective safety management system that is compliant with both HS (G) 65 and a recognised health and safety standard, such as ISO: 45001 or the British Safety Council's 5 star standard.

The requirements in this section will occasionally be supplemented by additional procedures or information to aid in their application. Where a project / contract has specific requirements not adequately covered by these arrangements they are to supplement appropriately with local procedures and communicate to those they affect; in addition the supplements are to be brought to the attention of the relevant Health & Safety Lead for inclusion within the groups arrangements as appropriate.

All CRH employees are required to be aware of the specific requirements that apply to their role and ensure, as far as possible, that they are followed. If for any reason it is not possible to follow the requirements, employees are responsible for advising their line manager who is to seek advice accordingly. These expectations also apply to the main approved CRH contractors including Lead Element Security and Supreme Guarding Services employees. Key roles for health and safety at the Centre are –

- CRH Wethersfield Operations Manager
- CRH Wethersfield Maintenance Manager
- Lead Element Security Team Manager
- Dodds Group Facility Manager

These arrangements support and compliment the Wethersfield CRH Standard Operating Procedures (SOPs)

1. Health and Safety Performance Objectives. The overall objective of CRH is to be continual compliant with health, safety, environmental and fire safety legislation, whilst also remaining contractual compliant with the safety aspects required by CRH customers (specifically the Home office). Prevention of accident and subsequent loss by identifying the learning from any incidents will significantly contribute to a continual improvement in the safety culture, protecting all, whether employees or those in our accommodation.

Any specific safety objectives need to be realistic and achievable and fit with the overall business plans and key performance indicators (KPIs). Internal and external audits and Centre inspections will inform the Centre objectives. The objectives and targets will be based on data generated from performance review and internal and external audit results. Progress against objectives will form an integral part of the business and contractual review process

Objective flexibility will be required at the Wethersfield Centre during its mobilisation and ramp up phases.

2. Performance Monitoring. CRH are governed by Home Office contractual Key Performance Indicators

3. Contact with Enforcement Authorities. CRH endeavours to form proactive and positive relationships with enforcement authorities such as the Health and Safety Executive, the Crown Premises Fire Safety Inspectorate, local fire services and local authorities. Periodically there may be a need to have contact with one of the enforcement authorities; either as proactive engagement or for other reasons such as an enforcement authority inspection, complaint or accident investigation. In order to maintain a consistency of approach any such contact is to be notified at the earliest opportunity to the CRH Contingency Sites Contracts and Standards Coordinator, ideally before entering into dialogue or correspondence at a local level.

4. Clinical Governance. CRH recognises that clinical Governance is a core requirement of the business, as the health and clinical provision of SUs is an important aspect of their accommodation stay.

CRH will work in a close, positive partnership with Home Office approved healthcare, and medical service providers to achieve the required standards of community based healthcare to meet the needs of SUs, inclusive of healthcare activities such as medical interventions, patient transport, recruitment, healthcare facilities management, and mental health and dentistry services. This commitment extends to assisting with any visiting medical emergency services.

Healthcare and medical service providers will be actively encouraged to contribute and participate in health and safety matters, including safety-monitoring procedures and accident and near miss reporting.

5. Food Safety. CRH will provide appropriate resources that enable our employees and subcontractors to provide clean, safe and wholesome food that protects the health of CRH food consumers. CRH will maintain management systems that allow us to monitor and continuously improve our food safety performance. The CRH policy is to consult and work proactively with staff, subcontractors and customers to ensure appropriate food safety standards are maintained at all times.

The Centre Supreme Guarding catering team develop and maintain the Food Safety management systems for Wethersfield. The food safety monitoring is the overall responsibility of the establishment CRH site manager, with delegated responsibility for food safety to the designated catering team including Head of Catering/Kitchen roles or equivalent. .

A regular food safety audit will be completed at Wethersfield, with audit findings and actions agreed with the local catering team. This process will apply equally to any findings from Environmental Health Officers inspections

CRH will appoint specialist food and dietary experts where required to ensure provided food is safe for consumption and meets the dietary health needs of SUs.

6. Management of Change. How change is managed can have a negative impact on safety if not appropriately considered at the planning stage. Where business changes such as technology, suppliers, processes, people, systems or environments are to be introduced it is the responsibility of senior management to ensure the health and safety implications have been systematically and appropriately identified and assessed with a plan developed to meet the communication and consultation requirements and any additional training needs identified. Where new control measures are implemented, line and senior management will be required to monitor their effectiveness.

Typically the major types of changes to the CRH business will be –

- Mobilisation of new accommodation contracts
- Ramp up phases of new accommodation

- Change in the use of accommodation or the type of SU
- Demobilisation of existing contracts
- Major amendments to contractual requirements

The first two bullet points currently apply to Wethersfield.

CRH will use a project management approach to management of change using the principles of the Prince2 project method. A project sponsor will be identified and a project team identified, headed by a project or mobilisation manager role

Health and safety will be a core aspect of project management, with access and involvement of a competent person/s (usually an external health, safety or fire consultant) either as a member of each project team or as a specialist advisor. Any safety related implications associated with change would be identified during the project process, assessed and reasonable actions taken to address within the project plan.

7. Business Continuity/ Emergency Planning. To ensure business continuity, each CRH contract will develop appropriate Business Continuity Plans and Disaster Recovery Plans (BCP). This will involve the development of contingency arrangements, which include the advanced planning and preparation necessary to identify the impact of potential loss, formulate and implement viable recovery plans that ensure continuity of services and administer a comprehensive training, testing and maintenance program.

In developing BCPs, it is essential that the health and safety implications associated with the BCPs are recognised and appropriately mitigated. In this respect, senior management are to ensure that the development process of BCPs include the identification of health and safety risks and appropriate controls to mitigate and control the identified risks, leading into the provision of relevant and necessary training, information and instruction for employees to implement the BCPs.

The information contained within the BCPs are reviewed as maximum period, annually. Reviews will also be carried out where new management, operations and processes begin or affect the BCPs, customer commitments and/or supplier relationships change.

Effective emergency plans are to be documented for foreseeable emergencies; these plans are to be kept up to date, made available and communicated to all relevant personnel and appropriate training and testing undertaken periodically.

8. Communication and Consultation. The development of a positive attitude to safety will only occur with involvement of all CRH employees. Critical to achieving this is the need to consult on all aspects of occupational health, safety and wellbeing and communicate the Centre's current issues and how these are intended to be managed. By involving the wider workforce in this process, it is anticipated that they will take some ownership of issues affecting their occupational health and safety.

Senior management are to ensure that all employees are kept aware of all initiatives and developments that affect their occupational health and safety. They should also inform employees of the results of any accident investigations that may directly affect them. Managers should ensure that when an individual requests information regarding employee occupational health and safety, this is provided in a timely manner.

9. Cooperation and Coordination. Where CRH occupies the same workplace as other employers, as at the majority of the accommodation Centres including Wethersfield, every effort will be made to coordinate and cooperate efforts to ensure the health and safety arrangements for the premises to protect all premises users from risk.

This will include the identification of risks to others during the risk assessment process with the information being shared with relevant parties so that an overall risk assessment and risk mitigation strategy can be produced where appropriate. Senior managers are to coordinate site activities with relevant stakeholders to ensure that CRH employees, contractors, visitors, SUs health, safety and welfare is maintained.

The CRH incident command structure and procedures will be used as the formal method of coordination and consultation to react to serious incidents and coordinate joint responses and resources. This will include:

- collaborating with relevant authorities over working environments, access and egress.
- Exchanging information relating to health and safety policies, risk assessments, inspections, audits, first aid arrangements, accident reporting and investigation.
- Co-operating with relevant site-specific requirements necessary to ensure the health and safety of all site users
- Effectively cooperating and coordinating joint plans to cover emergencies such as, fire, evacuation, bomb threats, hostage situations and other major incidents.

10. Supervision and Management. Adequate and competent supervision and management is essential in the prevention of accidents and occupational ill health. The majority of serious accidents occur where the management chain or supervision is inadequate. The level of supervision required for any task is commensurate with the level of risk and the competence of the people employed to carry out the task. Senior management are to ensure that an adequate level of competent supervision is provided within all contracts; additionally, they should ensure that the managers and supervisors are competent for their role, particularly with regard to occupational health and safety. This may require additional training for those in supervisory roles, such as IOSH Managing Safely Courses or the use of IT based training packages.

11. Health and Safety Training. Job, and where appropriate, task specific training in the hazards present in the workplace and the reduction of the associated risks is critical to successful health and safety management. All CRH personnel are to receive relevant and timely training to ensure they are competent to carry out their role safely. The type and nature of the training will depend upon a person's prior knowledge, experience and any previous training they may have had. This commitment applies equally to the CRH approved contractors.

Initial induction training will be provided to all employees, with periodic refresher and specialist training as appropriate. The minimum health and safety training requirements are detailed in individual role profiles and job descriptions. Line managers are responsible for ensuring that the appropriate training with regards health and safety are provided and recorded. Records of all health and safety training received by an employee are to be recorded, maintained and held securely.

12. Occupational Health.

12.1 New or Transferred Employees - When employing new or transferred employees recruiting managers are to ensure that the recruitment process considers the role requirements and any specific health requirements of their offered role. This is to ensure that the individual concerned is fit for employment and that the work they will be involved in will not present a threat to their health and safety.

12.2. Sickness Absence - Where an employee either is long-term sick, or suffers from recurrent short-term sickness absence, the sickness absence procedures are to be followed.

12.3. **Management of Injuries** - Where an employee has been injured through their work, an early occupational health intervention can increase the possibility of an early return to work. Occupational health intervention is available from the current Occupational Health providers.

12.4. **Health Surveillance** - Periodically there may be the need for employees to undergo health surveillance. This is likely where there are night workers, the use of hazardous substances that can lead to skin or respiratory irritation, high noise or vibration levels or hazardous substances that can damage the lungs or other parts of the body.

The need for health surveillance should generally be determined from the information gained when the risk assessment is carried out. Additionally, conditions identified on the employment health declaration may also prompt the need for health surveillance. In exceptional circumstances it may be considered necessary for an employee to be placed under health surveillance, advice should be obtained from the HR represented in consultation with the CRH health and safety manager/advisor.

13. Record Keeping. Record keeping is an essential aspect of occupational health and safety as it serves to demonstrate internally and externally that CRH have met the requirements of its policies and management system. Additionally, records are critical to being able to defend CRH in any enforcement action or civil claim. There are numerous records that CRH are required to keep, all of which serve different purposes, which are outlined below; none of the examples are exhaustive.

CRH will determine the type and nature of records required. Generally, a relevant form will be provided for the recording of data and is to be used for the intended purpose; this will ensure that the information is readily identifiable and traceable. The data collected is to be retained for various periods of time determined by its reason for collection. Examples of this are provided below;

Implementation. This relates to risk assessments, method statements, health and safety contractual requirements, training needs analysis and training provided. General risk assessments need to be kept for a minimum of 3 years. If for specialist purposes involving occupational health surveillance, it can be anything up to 40 years.

Injuries, ill health. Accident and incident reports, RIDDOR reports and GP notes. Electronic copies may be kept indefinitely, paper copies should be retained for a minimum of 3 years, particularly accident and investigation reports.

Statutory requirements. Certain items of equipment require periodic test and thorough examinations; this includes pressure vessels, electrical equipment, fire alarms and vehicles. The records from statutory tests and thorough examinations must be held securely. Any inspection reports made under the Work at Height Regulations should be kept for a minimum of 3 months.

Health surveillance – A limited number of CRH employees may require periodic health or medical surveillance; most likely permanent night workers. Wherever possible via effective rostering permanent night working is to be avoided. Where unavoidable, local risk assessments will determine health surveillance for night workers including frequency.

Active monitoring - In order to ensure that we are managing health and safety adequately, periodic monitoring will be carried out. The records will provide statistical evidence regarding our performance improvements over time.

Reactive monitoring - Records that result from accident/incident investigations, these will be critical to managing improvements that may be required and defending any actions.

Confidentiality - Some of the data collected will be, by its nature, confidential. This is particularly the case with occupational health information. Employees are expected to respect the

confidentiality of information and documents relating to themselves or others. It is an HR and line management function to ensure that all confidential information is stored appropriately with only appropriate and authorised access to it. This requirement will be aligned to the CRH General Data Protection Regulation (GDPR) policy.

Right of access - While some of the information recorded may be confidential, a large proportion is not and where appropriate this should be communicated to employees, particularly if it is relevant to their health and safety at work. There are also occasions when employees or their representatives can ask for certain information to be provided and they have a right to that provision, when this does occur, advice is to be sought from the CRH Data Protection Officer.

14. Contract Risk Management. CRH operates a wide variety of types of accommodation and size of accommodation. Acknowledging that Wethersfield will most likely be the current largest type of CRH SU accommodation based on area space and SU occupancy numbers these arrangements apply specifically to this Centre, supported by site specific health and safety risk assessments and a set of documented Standard Operating Procedures (SOPs). This is to ensure the specific requirements and risks involved in the delivery of each contract are both identified and safely managed based on the principle of “reasonable practicable”.

15. Risk Assessment. Safe working can only take place if all of the hazards that exist in a work task and environment are identified and evaluated. This process is called risk assessment and seeks to quantify the level of risk to which people are exposed. Once the risk has been quantified, it is possible to then determine what actions are necessary to either remove or reduce the risk.

Dynamic risk assessment is at the core of the CRH operational activities

Hazards and risks associated with the CRH work activities will be assessed and recorded in a number of ways, the majority completed using the CRH group policy and procedure for general risk assessment, but also covering manual handling, COSHH and DSE risk assessment approaches. The risk assessment approach for these risk categories are outlined separately in

Special attention is required for the following:

New & Expectant Mothers The work CRH employees undertake can be potentially damaging to the health of a pregnant worker or their unborn child. Additionally, there is also a potential risk to the new child and a nursing mother from certain hazards in the workplace, including within the CRH business acts of violence, exposure to infectious substances and second-hand exposure to potentially harmful substances – illicit drugs. Employees have a responsibility to notify CRH in writing, when they become aware that they are pregnant. Once CRH have been notified, line managers are responsible for carrying out an additional risk assessment to evaluate the level of risk to a pregnant employee or nursing mother.

Young Persons. It is the CRH policy that persons below the age of 18 are not employed.

All work places and activities are to undergo an appropriate level of risk assessment prior to the task commencing.

Risk assessments are to be reviewed when changes to the task, technology used, work environment or individuals may affect the risk employees and others are exposed to. As a minimum risk assessments will be reviewed annually.

16. Risk Control, Reduction and Removal. Risk control is the process of designing, implementing and maintaining measures that will reduce a particular risk. The primary purpose of risk assessment is to identify the measures necessary to either remove the risk completely or implement appropriate control measures to reduce the level of risk.

There are three possible ways to reduce the risk:

- 1) Reduce the likelihood.
- 2) Reduce the severity
- 3) Reduce likelihood and severity.

Control measures should be based upon the hierarchy of control shown below:

- a) Eliminate the hazard at source;
- b) Reduce the hazard at source – substitution;
- c) Remove the person from the hazard;
- d) Contain the hazard by an enclosure;
- e) Reduce employee exposure;
- f) Personal protective equipment (PPE); this is always to be used as a last resort and the use of PPE rather than any other control measure is to be justified on the risk assessment.

17 Reporting and Management of Accident and Incidents. All incidents and accidents involving CRH employees or that result from or in connection with CRH undertakings are to be reported as soon as possible after their occurrence and at least within 24 hours. It is the responsibility of all employees to report any incident/accident involving them or witnessed by them to their line manager; it is the line manager's responsibility to ensure the incident/accident is reported in accordance with the requirements of the CRH and where applicable, Home Office reporting policies.

CRH Site Managers are to ensure reportable accidents and incidents (RIDDORs) are reported to the enforcing authority within the appropriate timeframes. All accidents are to be appropriately investigated. Investigation is a line management responsibility; the level of investigation will depend on the nature and seriousness of the incident. CRH actively encourages the reporting of near misses, hazards or unsafe situations and opportunities for improvement by all employees.

CRH actively encourages reporting and as a result no CRH employee will be subject to any reprisals for the reporting incidents, hazards, unsafe conditions or risks. Data collected regarding incidents and accidents and their causes will be analysed in order to assist the organisations continual improvement and learning.

18. Contractor Health and Safety Evaluation and Management. Poor management of health and safety on the part of contractors employed by CRH can have a significant negative effect on CRH safety performance and our reputation generally. In order to ensure that, as far as possible, we only engage contractors who can competently manage their own health and safety. All contractors, prior to being placed on the approved contractor/supplier list are to be evaluated against health and safety requirements for the work they are to undertake.

At Wethersfield, this will be the prime responsibility of either the onsite CRH maintenance team, headed by the Wethersfield CRH Maintenance Manager or the appointed premises maintenance provider, expected to be Dodds Group.

In addition to the initial evaluation of the contractor, once engaged line managers are to assess individuals' competence to carry out the works, provide an appropriate site induction identifying site-specific hazards, review, agree methods of work, and establish a contractor specific monitoring regime.

19. Occupational Road Risk. Wethersfield Accommodation Centre is a controlled environment for vehicles, as only authorised vehicles are allowed access to the premises perimeter. Maximum

speed limits of 25mph are in force throughout the premises, reinforced by speed restriction signage and speed ramps. Pavements are provided for pedestrians with zebra crossing points at specific points on the main road between the accommodation blocks and the communal buildings. Road safety hazards are recorded in the Wethersfield general risk assessment.

20. Method Statements. Certain work tasks can be complex, or the risks associated with the tasks so significant that detailed instructions are required to ensure the risks are effectively managed. Where this becomes apparent, a detailed method statement is to be prepared and communicated to the relevant employees to identify the various procedures necessary to manage and control the risks. Additionally, it should be ensured that personnel drafting method statements have the technical and health and safety competence to do so.

There are some company and client procedures for activities defined as high risk such as HV electrical and pressure systems that contain detailed requirements for method statements, safety programmes and permits to work; these should be referred to too ensure safety and contractual compliance.

21. Permits to Work (PTW). Occasionally, the level of risk within a task cannot be reduced to an acceptable level due to the nature of the activity; this is particularly the case, for example, when working with certain electrical equipment, working in confined spaces and when carrying out hot work these activities should be controlled by the use of a Permit to Work system. Control and issue of Permits to Work will be a joint responsibility between the CRH site Maintenance Manager and the appointed contractor for overall site maintenance, expected to be Dodds Group. The CAFM system will be used as a tool to support the Permit to Work procedures.

22. Hazardous Substances. Generally, across CRH, the use of and exposure to hazardous substances is relatively limited. Additionally, where hazardous substances are in use their hazardous properties are often not significant. Cleaning products are the most likely type of hazardous substances although there is potential exposure to biological hazardous substances either through accidental or intention contact.

Regardless of the method of exposure to hazardous substances in the workplace, it is necessary to carry out a COSHH (Risk) assessment for the substances that our employees are exposed to in the workplace. The responsibility for this rests with the site managers, including the Wethersfield site manager. They should ensure that all direct and indirect exposures are assessed.

Significant findings of the assessment must be recorded and appropriate information, training and instruction provided to all employees.

The requirements for the assessment of legionella bacteria in water systems and the corresponding written schemes and control regime requirements for the prevention of Legionella will be the responsibility of the CRH Wethersfield Maintenance Manager, with assistance from the appointed maintenance service provider.

23. Working at Height. Work at height represents a significant risk, if only in terms of the potential for serious injuries or death to occur because of a fall from height. Operational employees are not expected to be significantly exposed to working at height, although the Wethersfield CRH maintenance are the most likely group of CRH employees to complete working at height activities, such as when changing light fittings.

Use of ladders is to be kept to a minimum. The CRH Wethersfield general risk assessment will identify the hazards associated with working at height and stipulate the controls measures required for each area or activity.

Following the requirements of procedures before work at height is allowed and ensure a risk assessment is undertaken for the work at height beforehand; this should include detail of the emergency arrangements for rescue. In all cases, follow the hierarchy of control:

- If it is not necessary to work at height – do not work at height
- Prevent a fall by the provision of such things as guardrails and toe boards or work restraint systems.
- Mitigate the consequences of any remaining fall risks by the use of such things as air bags or a personal fall arrest system.
- Give collective safety measures priority over personal safety measures.

24. Electrical Safety. The effects of electric shock can be significant and lead to fatal injuries. The hazards may arise from bad design, construction or installation of electrical equipment, or from inappropriate use or misuse of equipment. Where personnel are working with or near to electricity, and the work environment exposes people to electrical dangers, the guidance in HSG85 – Electricity at Work should be considered and where appropriate its recommendations implemented.

All personnel carrying out electrical work are to be competent for the work they are doing and are to be aware of, and understand, the requirements for working with electricity. Generally, CRH Facilities Management personnel or approved competent contractors are allowed to complete electrical work at Wethersfield. The Wethersfield CRH Maintenance Manager will be responsible for ensuring the CRH personnel have the suitable level of competence before completing any electrical work. Dodds Group will hold the same responsibility for electrical work commissioned by them.

All electrical equipment and systems will be maintained and undergo the requisite periodic inspections and tests to ensure any defects are identified and appropriate action is taken. It is a line management responsibility to ensure all electrical equipment under their control is appropriately maintained.

25. Confined Spaces. Where CRH activities involve entry into confined spaces the Confined Spaces Regulations will be fully complied with. A register of all permanent and transient confined spaces for each building is to be maintained by the CRH Maintenance Manager. All work in a confined space requires a specific risk assessment, control measures and emergency plans; it is a line management responsibility to ensure these are in place before entry into any confined space (as defined by the FM standard operating procedure for Permits to Work). All personnel involved in work in confined spaces will be competent to do so and have received the appropriate confined space training, refreshed at appropriate intervals.

26. Gas Safety. The management of natural gas systems and equipment is essential to the safety of the building and its occupants. All personnel working on natural gas systems and equipment will be competent and registered under the relevant “Gas Safe” scheme.

Medical Gas Pipeline Systems and Medical Gas cylinders will be managed in line with the requirements of the relevant HTM published by the Department of Health. This will involve the appointment of Authorised Engineers, Authorised Persons and where appropriate Designated Porters.

Where gas cylinders are used, Managers are to ensure these will be managed in line with the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment, detailing the use, storage, and monitoring and management arrangements within the local SHE Plan.

It is not expected that CRH personnel will use gas equipment. However, if gas equipment is used, the CRH Maintenance Manager is to ensure the equipment is safe and in good working order

through appropriate user and management inspections as well as diligent evidence checks for statutory test and inspection.

All activities involving the installation, maintenance or servicing of stationary refrigeration, competent persons under an appropriate Company Certificate will only carry out air-conditioning and/or heat pump equipment containing or designed to contain F-Gas refrigerants with registers being held for all systems.

27. Fire Safety. Fire and the effects of fire is one of the hazards that can potentially affect all employees and SUs at the Wethersfield Centre. Depending on the seriousness and location of a fire, it has the potential to kill if control and evacuation does not happen quickly.

CRH recognises the unique fire risks associated with managing asylum seeker accommodation, influenced by factors such as arson attacks from outsiders and SUs potential lack of understanding and experience of the importance of fire safety procedures as required in the UK.

CRH acknowledges its responsibilities and will ensure that fire safety management including risk assessment, general fire precautions and preventive and protective measures are in place to meet our statutory obligations and mitigate the risks from fire to people and property.

The CRH Wethersfield Centre Manager will ensure the implementation of the requirements of the Regulatory Reform (Fire Safety) Order 2005 and ensure the maintenance of general fire precautions in line with best practice.

Where not directly responsible for the fire arrangements, CRH will ensure cooperation and coordination with other Responsible Persons to ensure the safety of all. This will be for Wethersfield the Home Office, Dodds Group and Lead Element Security.

Responsible persons (Directors and Executive Committee members) are responsible for ensuring that suitable and sufficient fire risk assessments are completed and that there is an effective, workable and communicated emergency plan in place for all locations under their control. CRH employ the services of a fully qualified fire risk assessor consultant to complete the Wethersfield fire risk assessment and review the assessment as required. The Wethersfield Centre Manager will track action plans generated from the fire risk assessment for completion, with assistance from the CRH Maintenance Manager.

28. Design Responsibilities. Where a project or contract involves design work of buildings or systems, employees with responsibility for the design, are to ensure that they consider the health and safety implications during the construction or installation phase of the project and also any safety implications post construction / installation.

As far as possible,
CRH will:

- Design to avoid risks to health and safety;
- reduce risks at source if avoidance is not possible;
- consider measures that will protect all workers if avoidance nor reduction to a safe level is possible; and
- ensure that the design includes adequate information on health and safety.

Where any design work is outsourced, the Senior Manager in control is to ensure that only competent designers are used and the designs are validated prior to the construction / installation phase. All design, construction and where applicable installation works will be undertaken in full compliance of the Construction (Design and Management) Regulations.

29. Construction Design and Management (CDM). CRH recognises the requirements and duties imposed under the CDM Regulations in respect of work activities, both on CRH and others.

CRH believes for the successful delivery of a project, good working relationships between all duty holders is essential from the start, to this CRH will work with all Clients and other duty holders to agree and establish duty holdings and responsibilities for each project as soon as practicable at the conception stage. This includes any construction work completed at the Wethersfield Centre.

The wide definition of construction work does mean that some maintenance activities undertaken by CRH may fall within the requirements of the CDM Regulations. In order to meet the requirements placed upon CRH it is essential that the robust management procedures in place for the procurement and management of contractors, the identification and mitigation of risk and the monitoring arrangements are maintained for elements of maintenance works undertaken. Local arrangements and responsibilities with regards compliance with CDM are to be documented in the Contract SHE Plan, responsibilities of all parties will be held in the SHE matrix providing clarity for all parties.

Where CRH have a duty holding responsible Managers and Directors will ensure the duties are fulfilled by competent personnel who are clear as to their obligations and responsibilities; all appointments will be made and confirmed in writing and include the extent and time period of such appointment.

CRH will commit to ensuring that the maintenance team and other identified roles that have duties to ensure CDM compliance, will receive appropriate training in CDM to understand CDM requirements and their individual responsibilities.

Where work activities are identified in the broad scope of CDM and are under the control of CRH, then the CRH Maintenance Manger holds overall responsibility for management of CDM and is the designated competent person within the business for CDM.

30. Personal Protective Equipment (PPE). CRH acknowledges the hierarchy of control approach which include the principle of only providing PPE as a last resort when other control measures are impractical or not possible.

However, the nature of some of CRH work activities dictates that on occasions PPE is the only acceptable control measure; its use is to be justified on the risk assessment.

Selection of PPE. Prior to providing PPE to control a workplace hazard, line managers are responsible for its correct selection. The following points are to be considered when selecting PPE.

- Is it appropriate for the risks involved and the conditions at the workplace where exposure may occur?
- Does it take account of any ergonomic requirements and constraints?
- Consider the state of health of the person who will wear it.
- Is it capable of fitting the wearer correctly after appropriate adjustments?
- As far as possible it is to effectively prevent or adequately control the risks without increasing the overall risk. For example, this could cover the provision of ear defenders that would prevent audible warning sounds being heard.
- Is it legally compliant?

The assessment of PPE must be recorded. To assist line managers with the selection of the most appropriate PPE the CRH preferred supplier will advise on the selection of PPE as necessary.

Use of PPE - Prior to using PPE, all employees are to be provided with information, instruction and training in its use and maintenance.

- Information is to cover the hazards that the PPE is designed to protect against and any limitations in its effectiveness.
- Instruction is to cover how to use the PPE correctly, how to test it, any maintenance that is required and how to report faults.
- Training is to cover the effective use of the PPE including its cleaning, storage and maintenance.

Records of Issue. The issue of all PPE items is to be recorded; the record should record the type of PPE supplied, the date of issue, frequency of maintenance required, frequency of cartridge/filter changes, fitting requirements, training provided and hazards protected against.

31. First Aid. Occasionally accidents will happen to CRH employees or to persons on located on CRH premises, if this does happen CRH will need to ensure that appropriate first aid is readily available.

Predominately, CRH discharge the First Aid responsibilities to Lead Element Security Ltd, who ensure that all of the LES Security Officers are trained as First Aiders. This is the case at the Wethersfield Centre An assessment is to be undertaken and recorded to identify the first aid requirements. LES Security Officer are frequently patrolling the Centre so will typically be best placed to respond quickly to situation and administer.

LES are to nominate a responsible person to check the first aid equipment and facilities periodically. This should be in line with the nature of the site, the hazards present and the frequency of any accident reports. In any case, it should be no greater than monthly.

Further medical assistant will be available from the NHS medical professionals who operate the Centre Medical Centre. .

No CRH employee, while at work, is to provide first aid above their level of competence. Managers are to ensure their staff are aware of this

32. Manual Handling. Where there is a significant risk involved in a manual handling operation and the task cannot be avoided by redesign to eliminate the need for manual handling, a specific manual handling assessment will be undertaken and recorded. Line management are to ensure all manual handling activities that present a significant risk are assessed, planned and appropriate control measures put in place to ensure individuals safety. It is anticipated that the local CRH maintenance team will most likely be exposed to manual handling tasks. Where CRH employees undertake manual handling activities they will receive appropriate training and instruction, organised by the CRH Maintenance Manager.

33. Work Equipment. Across CRH, a wide variety of work equipment is used on a daily basis. The equipment varies from the relatively simple to the complex, and all of them present their own hazards and risks that are to be assessed and controlled. All persons using or maintaining work equipment will be competent through the provision of training, information, instruction and appropriate supervision.

34. Lifting Operations and Lifting Equipment. In conjunction with the Provision and Use of Work Equipment Regulations (PUWER), Lifting Operations and Lifting Equipment Regulations (LOLER) specifically requires the safeguarding of people working with and operating lifting equipment, and to control the way in which they use and maintain lifting equipment. Lifting equipment is defined by LOLER as equipment used at work for the lifting and lowering of loads and persons and includes attachments used for anchoring, fixing and supporting the load. This covers a wide variety of items including cranes, forklift trucks, passenger lifts and lifting accessories such as ropes, slings and eyebolts.

CRH will ensure any relevant lifting equipment used by CRH personnel is covered by LOLER is subject to periodic inspections by an independent competent person as appointed by the company. The minimum statutory examination frequencies, as prescribed in LOLER will be:

- 6 months Lifting equipment that lifts people
- 6 months Lifting accessories, including shackles, hooks, chains etc.
- 12 months All other lifting equipment, including cranes and loading equipment

All equipment will be assessed against the risk posed before being brought into service to determine the appropriate frequencies for inspection giving due consideration for the operations performed in specific circumstances, since those risks may well affect the required frequency of inspections prescribed in LOLER. Alternative examination frequencies will be specified in a written scheme based on the risk assessments of the equipment. In addition, examinations will be carried out:

- before the equipment is put into service (unless it has a declaration of conformity dated within the previous 12 months)
- Immediately following installation or re-installation
- after an exceptional event, for example, an accident.

All lifting operations will be subject to suitable and sufficient risk assessment with appropriate emergency plans developed and communicated.

35. Noise. Exposure to high noise levels has the potential to damage the hearing of those exposed. The extent of the damage is related to the noise level and the exposure time. There are occasions when the noise is instantly damaging; fortunately, those cases are rare, if not non-existent in JCRH work areas, including Wethersfield. .

Most of the noise to which CRH employees and those on the premises operated by CRH will be exposed is relatively low-level and therefore has limited potential to cause hearing damage. There may be occasions when equipment CRH or approved subcontractors are using, or equipment in areas where we are working may cause exposure to noise that can lead to hearing damage. As with all other workplace hazards, it is necessary to carry out a risk assessment for all employees and others potentially exposed to high noise levels, when carrying out any assessment, always remember to consider client's and other contractor's noise sources

36. Vibration. Pieces of equipment are in use across CRH; particularly in use by the facilities, management team may potentially expose users to hazardous levels of vibration. This may lead to a variety of health effects depending on the nature and source of the vibration.

Many of the vibration sources will be hand held equipment that may lead to damage of the hands and arm. Additionally, we occasionally use various items of ride-on machinery that may lead to whole body vibration effects. More rarely for CRH employees, it is possible to suffer whole body effects due to vibration transmitted through the feet from vibrating surfaces on which people stand. All potential exposures to vibration are to be identified and assessed with appropriate control measures and where appropriate health surveillance is implemented.

37. Asbestos. No CRH employee will knowingly work with asbestos containing materials (ACMs). In order to ensure, as far as possible, that employees and others are not accidentally exposed to asbestos, where our work is likely to result in damage/disturbance to the fabric of any building an adequate investigation through a refurbishment and demolition survey is to be carried out prior to any work commencing to determine the presence of ACMs. All buildings within which CRH will work or operate including Wethersfield are legally obliged to hold an asbestos register, consult this prior to any work planning. Where asbestos is present, CRH are to identify if any work is likely to cause it to be damaged. If damage and fibre release is possible, the work is not to be undertaken until the asbestos is removed or otherwise protected by a competent and licensed asbestos removal specialist.

All employees that could potentially disturb ACMs will receive asbestos awareness training in order for them to recognise potentially dangerous materials and understand the dangers and precautions necessary, this training will be refreshed annually.

The Wethersfield Centre will require a specific asbestos management plan. The plan is to identify all areas of the building where ACMs are present and define the management of the identified material. Information regarding the presence of asbestos will be brought to the attention of any appropriate building user, CRH employee or contractor working in, or on, those premises.

38. Violence at Work. CRH recognises the potential for our employees and others working on our behalf to be exposed to violent behaviour. This type of behaviour is considered intolerable by the organisation and every effort will be made to prevent such exposure.

The causes of violence are many and varied and it is difficult to identify all persons who may be potential assailants. Due to the complexity of the problem and the unique nature of managing asylum seeker accommodation, it is not possible to ensure that all employees are protected against all potentially violent behaviour.

However, it is possible, through good risk management to give employees the skills to identify potentially violent situations and implement control measures to ensure the safety of employees.

LES are the most likely group of employees to be involved in incidents of violence at Wethersfield, whether aggression and violence from SUs or outsiders. The Wethersfield Security Team Manager is to ensure Security Officers are aware of the most likely types of violence and aggression at the Centre and have the necessary skills, training, information and aids to manage violent situation as safety as possible.

Additionally CRH will work proactively with the Home Office and the local Police to share learning and initiatives relating to violence at work as violence reduction is continually a key objective of the CRH business.

39. Display Screen Equipment. The use of display screen equipment will be a work activity for a number of the CRH employees at Wethersfield and if appropriately managed does not cause ill health to users. An assessment of workstations and the provision of training, information and instruction for users will be provided. Line managers are to ensure users are provided with the correct and appropriate equipment, training, information and instruction and workstations are assessed to ensure the risks are appropriately managed.

40. Signs and Notices. To ensure essential safety information is communicated at relevant locations line managers are to ensure that relevant and appropriate safety signs, notices and warning labels are prominently displayed. The signs and notices are to be in accordance with current legislative and best practice standards.

41. General Workplace Safety. The general work environment can pose risks to the health and safety of users if not appropriately planned and managed. The Centre general risk assessment

identifies the CRH approach to identify the risks with the general work environment and provides details on minimum requirements and control strategies.

Senior management are to ensure all workplaces used by CRH employees meet these minimum standards. Where the general work environment is supplied by a third party any deficiencies or hazards identified must be brought to the attention of the party in control in order to agree and action necessary remedial measures.

42. Protection of Others. Others. There are many occasions when the activities of CRH interface with our clients' personnel or members of the public. On all occasions client and public safety is paramount. Risk assessments and methods of work will be used to identify and eliminate risks to ensure the safety of the others.

43. Mental Health and Wellbeing. Stress-related ill health is a growing problem. In many cases, the source of stress leading to ill health is not work related, but relates to issues away from work that affect an individual's capacity for work. In the main stress related illness can be prevented by good management practices.

Occasionally, an employee may be exposed to a greater level of occupational stress due to an increased workload, taking on additional responsibility or promotion, or suffer trauma post a serious incident (such as a death at the Centre). It is incumbent on senior management to identify the potential for this, before appointing an employee to the position. Additionally, where employees believe they are suffering from increased levels of occupational stress, they have a responsibility to bring this to the attention of their line manager.

44. Infectious Diseases. CRH recognises that the nature of some of our work activities and environments have the potential to increase the risk to our employees of contracting an infectious disease. Line managers will ensure that all employees, including first aiders, are given sufficient information and instructions about protection from blood borne diseases as well as other common infectious diseases to enable them to protect themselves and others from infection. The provision of suitable equipment and materials and a safe means for disposal of clinical waste will be established wherever the risk is identified.

Where the risk assessment identifies employees to be at a higher risk of exposure to Hepatitis B, Covid 19 and or TB during their work, they will be encouraged to receive inoculation, subject to national priorities, Home Office or Public Health England guidance. Those who are or may be infected are given all possible support, care and access to the appropriate medical, social and counselling facilities thereby enabling them to best cope with their conditions. The Wethersfield Infectious Diseases Plan provides detailed guidance on how infectious disease control is managed at the Centre.

45. Drugs and Alcohol. CRH is committed to maintaining healthy, safe and productive working conditions for its entire staff. CRH recognises the impact that both alcohol and drugs may have upon an individual's ability to work safely and correctly and, as such, aims to ensure a working environment free from the inappropriate use of substances and where its employees are able to carry out their duties in a safe and efficient manner.

CRH policy is that it is not acceptable for employees to consume, possess or test positive for the presence of alcohol or drugs whilst at work or to not comply with any legal obligations with regard to alcohol or drugs. CRH aims to ensure that the use by an employee of either alcohol or drugs does not increase the risk to security or the safe and efficient running of the organisation or the health and safety of its employees and customers and members of the public. .

46. Lone Working. Lone workers are those who work by themselves without close or direct supervision. Although there is no general prohibition on working alone, it is the Line Manager's responsibility to assess the risks to lone workers and take steps to avoid or control risk where necessary. It is also the responsibility of the employee (lone worker) to take reasonable care of

themselves and other people affected by their work and co-operate with their employer. Due to the very nature and risks associated with managing the Centre, lone working is expected to be rare for CRH personnel, but could be more likely for the LES Security Officers. Therefore, the LES Team Manager will, wherever lone workers are identified local risk assessments must be completed with control measures identified and completed to reduce the risks of lone working to an acceptable level.

CRH recognises its duties under legal provisions to, so far as is reasonably practicable, protect the health, safety and welfare of its employees, including those contracted to work from home. Health and safety requirements apply equally to employees working from home as those

48. Legal Compliance. The CRH Group Statement of Intent outlines the company committing to compliance with applicable health and safety legislation. The CRH monitoring procedure will be the primary tool for measuring legal compliance, using a blend of internal and external audits and inspections to provide management information of legal compliance performance.

The Centre CRH Maintenance Manger will monitor statutory compliance across the FM areas of responsibility

49. Radiation Protection. It is not anticipated there will be any devices at the Centre that provide a radiation source. However, if any equipment is introduced to the premises where a radiation source is present, then CRH will appoint a -

Radiation Protection Supervisor (RPS) from within the local staffing group. The RPS will be responsible for ensuring compliance with arrangement and local rules for radiation under the Ionising Radiation Regulations 2017 (IRR17). Training, including refresher training, will be provided to the RPS to demonstrate competency, with training needs determined by the complexity of the radiation type work being undertaken and advice given by the RPA.

Radiation Protection Advisor (RPA) to advice on compliance with IRR17.

