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#### 1. STATEMENT OF INTENT

It is the policy of MG ALBA to ensure, as far as reasonably practicable, the health, safety and welfare of its employees whilst at work, and to have due regard for others such as users of the facilities, contractors, visitors or members of the public.

This is a statutory duty under the Health and Safety at Work Act 1974 and supporting regulations.

MG ALBA's aim is to ensure good standards of health and safety practice and compliance and to minimise the risk of injury, damage or loss to persons or property, including:

- To provide and maintain a safe place of work.
- To provide comfortable working conditions to include adequate welfare facilities.
- To provide equipment and Personal Protective Equipment (PPE) for use
- To provide employees with information, training, instruction and supervision.
- To assess the risks associated with the workplace and implement adequate control measures.
- To monitor compliance with health and safety.
- To prevent environmental nuisance, air and water pollution and ensure appropriate waste disposal.
- To comply with our legal duties.
- To ensure the safety all of employees, contractors and the general public.

#### Our objectives are:

- To prevent any major accidents occurring in the workplace during our undertakings.
- To ensure no enforcement notices are issued from the Health & Safety Executive (HSE) or Local Authority.
- To increase the reporting of minor accidents, near misses and dangerous occurrences.
- To increase employee awareness of health and safety through consultation, toolbox talks and specific training.
- To ensure relevant disciplinary procedures are in place.

MG ALBA employees have a statutory duty to take reasonable care for the health and safety of themselves and others that may be affected by their acts or omissions at work and to co-operate with the Board and Management to meet the obligations of MG ALBA.

Management and a staff Health & Safety Group provide and maintain effective procedures for consultation and communication between all levels of management and employees on all matters regarding health and safety.

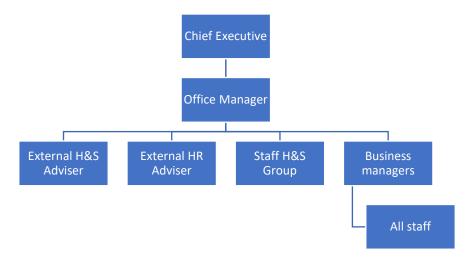
MG ALBA expects that the statutory duty to comply with regulations is a minimum requirement only, and that employees co-operate to continuously improve standards in all aspects of health and safety at work.

All employees have my full support in the implementation of this policy.

In Mordon	31/3/23
Chair	Date
Janel Mysbell	31/3/23
Chief Executive	Date

#### 2. MANAGEMENT STRUCTURE

# 2.1 Hierarchy of Responsibility (Health, Safety and Welfare)



#### 3. ORGANISATION OF HEALTH AND SAFETY

MG ALBA recognises that effective management and the responsibility for health and safety is a matter for the Board and the Chief Executive. In order to establish control and maintenance of health and safety management day in day out, roles and responsibilities are assigned to employees within the company to manage health and safety in the workplace.

It is essential that job descriptions and the associated responsibilities are unambiguous and well defined for individuals to undertake their duties effectively and for health and safety to be managed as a whole throughout the company. The aim is to ensure compliance with the Health and Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999 and other relevant statutory obligations.

All employees must acknowledge their own individual responsibilities towards health and safety of themselves and others in the undertaking of their works for the Partnership, under the Health and Safety at Work Act 1974 and their common law duty of care.

The purpose of health and safety organisation is to harness the collective enthusiasm, skills and effort of the entire workforce with managers taking key responsibility and providing clear direction to prevent accidents, promote good performance standards and a positive culture.

# 3.1 Individual Responsibilities

## 3.1.1 Board Members

Board Members have overall responsibility for ensuring health, safety and welfare within the company. They are responsible for ensuring the implementation, monitoring and review of the Health and Safety policy and its safe working procedures. This is accomplished by delegation of responsibilities.

The responsibilities of the Board Members include:

- Demonstrating visible, active commitment in the oversight of health, safety, wellbeing and welfare.
- Holding the Chief Executive and senior management to account for the identification and management of risks and for integrating good practice in health, safety and welfare management into business decisions.
- Monitoring and reviewing performance.
- Ensuring:
  - the company health and safety policy is in place, is brought to the attention of all employees, and is complied with:
  - health and safety training is in place and that all employees have adequate awareness, motivation and attitude towards health and safety;
  - competent advice is in place and being followed;
  - o adequate resources are provided, including the provision of PPE as appropriate; and
  - all accidents are investigated.

#### 3.1.2 Chief Executive

The Chief Executive has full delegated authority from the Board in all matters of Health and Safety, and will:

- Have an understanding of legalisation especially:
  - Health and Safety at Work Act 1974 and supporting regulations with assistance from the Office Manager and the External Safety Advisor; and
  - o Legislation concerning the welfare and wellbeing of persons employed or engaged by MG ALBA.
- Ensure proper and effective implementation of policy by delegation to competent persons in the
  - Selection and maintenance of equipment
  - Design and operation of process
  - o Information, instruction and training of people at risk
  - o Supervision
- Ensure that responsibilities are properly assigned understood and accepted at all levels.
- Ensure Health and Safety Policy is kept reviewed.
- Ensure risk assessments are carried out and the points raised receive proper attention.
- Report to the Board Members on major safety matters that arise.
- Act as the Board Members representative to the Health and Safety Executive.
- Ensure corrective actions are undertaken in any aspect of health and safety.
- Setting a personal example.

## 3.1.3 Office Manager

The Office Manager has specific responsibility to:

- Ensure competent personnel carry out tasks and are fully aware of the hazards to be encountered.
- Ensure that all health and safety work is carried out promptly.
- Ensure that contractors are aware of the Company Health and Safety Policy prior to any work being done.
- Ensure permit to work systems are in place and correctly applied and used by competent personnel.
- Ensure that due attention is paid to health and safety matters in areas of
  - o The use and operation of equipment.
  - o Provision of information, instruction and training.
  - o Supervision
- Ensure risk assessments are carried out when appropriate and hazards so far as reasonably practicable are eliminated.
- Review safety accident statistics and other safety reports and taking action to reduce unfavourable trends.
- Investigate and report on accidents and dangerous occurrences in accordance with company procedures and take prompt remedial action.
- Setting a personal example.

# 3.1.4 Business Managers

Business Managers have key responsibility for making Health and Safety Policy work effectively within their business functions. They will:

- Ensure due attention paid to health and safety matters in their areas of responsibility in particular.
  - o The use and operation of equipment.
  - Provision of information, instruction and training.
  - Supervision
- Ensure risk assessments of their areas are carried out effectively and that hazards are identified and so far as reasonably practicable are eliminated.
- Provide full details of risk assessments and accident and other investigation reports to the Office Manager for the purposes of arriving at appropriate conclusions and implementation of corrective action.
- Identify unfavourable trends and propose remedies to the Office Manager or Chief Executive.
- Ensure that all colleages within their business functions are competent to fulfil their related obligations.
- Carry out regular reviews within their functions.
- Promote safe conduct within their functions.
- Set a personal example in following procedures and the use of personal protective equipment as appropriate.

## 3.2 Employees

The responsibilities of employees are to:

- take reasonable care of themselves and others who may be affected by their acts or omissions whilst at work
- cooperate with employers in assisting them to fulfil their statutory duties
- not to interfere with deliberately or misuse anything provided, in accordance with health and safety legislation, to further health and safety at work
- use any equipment, substance or undertake any works in accordance with any training, instruction or procedure given by the employer
- report to the employer any serious or imminent danger or new hazards and risk
- report any shortcomings in the employer's protective health and safety arrangements and provisions
- read and understand the company health and safety policy
- · take care of and use the PPE provided by the employer
- report all accidents, near misses and dangerous occurrences immediately to their supervisor
- assist and consult with Management and the Health and Safety Advisor on safety issues
- set a personal example to others, behave both legally and responsibility whilst at work
- avoid taking shortcuts and improvising at all times without discussing the issue with a supervisor first
- inform management without fail, of any known health conditions or disabilities that may affect their ability to work safely

## 3.3 Advisers

The Health and Safety Adviser is engaged to provide independent advice, including when appropriate to the Chief Executive, the Audit & Assurance Committee and the Board.

The Adviser is engaged to:

- provide third line of defence assurance on MG ALBA's compliance with the relevant legislation and with this Health & Safety policy, by carrying out and reporting on audits, inspections and reviews (for example of risk assessments and method statements)
- annually review this Health & Safety policy and make recommendations to management so as to ensure policy and procedures are relevant and up to date
- anually provide a report for presentation to the Board which will include recommendations to management and
  the responses of management, informing the Board of any Health and Safety weaknesses and identifying
  necessary remedial action and training
- investigate all accidents, near misses and dangerous occurrences under RIDDOR as instructed by the Office Manager and/or the Chief Executive
- if required, act as a point of contact for health and safety agencies i.e. HSE and Local Authority
- if required, represent the Company in discussion on health and safety issues with H&S agencies
- aid in the promotion of a positive health and safety culture within the Company

The HR Adviser is engaged to provide independent advice in the areas relating to welfare and wellbeing set out in Part 5 below.

The responsibility of the Adviser is to:

- provide third line of defence assurance on MG ALBA's compliance with the relevant legislation and with this Health & Safety policy, by carrying out and reporting on audits, inspections and reviews (for example of risk assessments and method statements)
- annually review this Health & Safety policy and make recommendations to management so as to ensure policy and procedures are relevant and up to date
- on an annual basis, to provide a report for presentation to the Board which will include recommendations to management and the responses of management, informing the Board of any Health and Safety weaknesses and identifying necessary remedial action and training
- investigate all accidents, near misses and dangerous occurrences under RIDDOR as instructed by the Office Manager and/or the Chief Executive
- if required, act as a point of contact for health and safety agencies i.e. HSE and Local Authority
- if required, represent the Company in discussion on health and safety issues with H&S agencies
- aid in the promotion of a positive health and safety culture within the Company

# 3.4 Health & Safety Consultative Committee

Employers have a duty to consult with their employees, or their representatives, on health and safety matters. In workplaces where employees are not in a trade union, the Health and Safety (Consultation with Employees) Regulations 1996 (as amended) applies.

The Health and Safety Consultative Committee will consist of the Office Manager, Health & Safety Advisor and three staff members and, when matters relate to welfare and wellbeing, the HR Advisor.

The primary function of the Health and Safety Consultative Committee is to tolow for full and effective employee consultation on matters such as:

- the introduction of any measure which may substantially affect health and safety at work, eg the introduction of new equipment or new systems of work;
- securing adequate support and training to help them staff comply with their obligations;
- ensuring staff are informed on the risks and dangers arising from their work, are furnished with measures to
  eliminate or reduce those risks, and know what to do should they be exposed to a risk including emergency
  procedures;
- the planning and organisation of health and safety training;
- making risk assessments or accident records;
- communicating with the company's Investors in People Group, senior management and all staff.

#### 4. ARRANGEMENTS FOR HEALTH AND SAFETY

## 4.1 First Aid

Adequate first aid provision will be made available in the place of work occupied by the MG ALBA and vehicles used by its employees.

MG ALBA will provide first aid and refresher training for up to six members of staff. The list of Emergency First Aid at Work (FAW) trained persons will be available on the staff notice boards and on the Intranet. The list will be maintained by the Office Manager.

Each first aid box shall be suitably marked and be easily accessible to all employees at all times when at work. A first aider will undertake weekly checks that the first aid box is available and fully stocked. He/she will also aid in the recording of incidents in the accident book and assist the Health and Safety Advisor in any accident investigation if requested.

As a guide, where no special risk arises in the workplace, a minimum stock of first-aid items would normally be:

- First aid guidance card
- 20 individually wrapped sterile adhesive dressings (assorted sizes);
- Two sterile eye pads;
- Four individually wrapped triangular bandages (preferably sterile);
- Six safety pins;
- Six medium sized (approximately 12 cm x 12 cm) individually wrapped sterile unmedicated wound dressings;
- Two large (approximately 18 cm x 18 cm) sterile individually wrapped unmedicated wound dressings;
- One pair of disposable gloves.
- You should not keep tablets or medicines in the first-aid box.

All persons on the premises of MG ALBA at any time should be made aware of the location of the first aid box and of the nominated person through the induction process and where appropriate, signage.

## 4.2 Welfare facilities

Adequate provision of welfare facilities, where appropriate and in accordance with the Workplace (Health, Safety and Welfare) Regulations, will be made available for employees, to include:

- clean and working toilet facilities
- washbasins with hot and cold running water

- soap and towels
- drinking water
- a rest area to make hot drinks and eat food
- suitable and sufficient lighting
- suitable seating and workstations

# 4.3 Personal Protective Equipment (PPE)

Employees will be provided with appropriate PPE to undertake works for MG ALBA, free of charge. Where applicable to the works being carried out and as a result of a risk assessment, the provision of gloves, head protection, eye protection, hearing protection, respiratory personal equipment (RPE), non-permeable overalls, protective clothing and skin protection will be made available as required.

If entering onto construction sites or similar, permission must be sought from the Site Manager or Site Supervisor where PPE is not deemed necessary (i.e. project nearing completion and no work ongoing).

Employees must report to their Line Manager defective or a lack of personal protective equipment. MG ALBA will carry out annual checks on PPE supplied and in line with maintenance instructions provided.

# 4.4 Accident Reporting

All accidents and incidents (near misses and dangerous occurrences) must be reported immediately to the Office Manager, who will inform the Chief Executive. Details will be recorded in the accident book and kept on file. The accident book will be maintained by the Office Manager.

A record must be kept of any accident, occupational disease or dangerous occurrence which requires reporting under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013); and any other occupational accident causing injuries that result in a worker being away from work or incapacitated for more than three consecutive days (not counting the day of the accident but including any weekends or other rest days). You do not have to report over-three-day injuries, unless the incapacitation period goes on to exceed seven days.

Serious and major accidents must additionally be reported to the enforcing authority i.e. HSE Infoline, as soon as practicable by the Health and Safety Advisor, under RIDDOR, and to the Chief Executive, who will contact the next of kin (if an employee). An accident form (F2508) will be sent to the enforcing authority within 10 days.

Types of reportable injury include:

- all deaths to workers and non-workers if they arise from a work-related accident, including an act of physical violence to a worker. (Note- suicides are not reportable, as the death does not result from a work-related accident);
- over-seven-day injuries to workers where an employee, or self-employed person, is away from work or unable
  to perform their normal work duties for more than seven consecutive days (not counting the day of the
  accident).
- a fracture, other than to fingers, thumbs and toes;
- amputation of an arm, hand, finger, thumb, leg, foot or toe;
- permanent loss of sight or reduction of sight;
- crush injuries leading to internal organ damage;
- serious burns (covering more than 10% of the body, or damaging the eyes, respiratory system or other vital organs;
- scalpings (separation of skin from the head) which require hospital treatment;
- unconsciousness caused by head injury or asphyxia;
- any other injury arising from working in an enclosed space, which leads to hypothermia, heat-induced illness or requires resuscitation or admittance to hospital for more than 24 hours.

Reports to the enforcing authority of all of the above categories, except over-seven-day injuries, must be made immediately by the quickest practicable means and followed up by written notification within 10 days. Reports of over-seven-day injuries must be made to the enforcing authority within 15 days.

All accidents/incidents will be investigated by the Health and Safety Advisor promptly with assistance from the Office Manager, Line Manager, First Aider and any other person deemed necessary. An Internal Accident Report form will be completed to take details of the person and accident, where appropriate witness statements will be compiled and enable the Health and Safety Advisor to finalise an investigation report to the Chief Executive. The investigation will aim to:

- determine the immediate and underlying causes
- prevent recurrence
- gather information for criminal or civil proceedings
- confirm or refute claims
- prepare to notify the HSE
- implement recommendations

The degree of investigation will be dependent on the seriousness of the accident.

# 4.5 Training

The company will fulfil its statutory obligations (Health and Safety at Work etc Act 1974 and Management of Health and Safety at Work Regulations 1999) by providing information and training to all employees to enable them to undertake their roles and responsibilities competently. Training will be provided in the following situations:

- Induction training for new employees (H&S awareness, MG ALBA policy, procedures)
- The introduction of new or increased risks
- A change in an employees role, activity or responsibility
- At appropriate intervals for refresher training

Training is also specifically provided for work with health and safety hazards, such as:

- Manual handling
- First aid
- Fire Safety Awareness and Extinguishers
- Working at height, including Ladders

Training is formally recorded in the MG ALBA training file. Training is provided depending on the recommendations of the Management, the H&S Advisor, Risk Assessments and the needs of the task to be carried out. It is either outsourced to training providers or completed in house by competent persons. The training plan is reviewed annually for new and refresher training requirements.

## 4.6 Induction Training:

All short term, casual and first-time visitors to the premises require to go through a very short induction process to read and understand some on-site welfare and safety information and to comply with certain requirements such as parking and security measures. Visitors must sign the Visitor's Book both on arrival and departure from the building.

All MG ALBA employees will also attend a more specific induction during the first month of employment. This induction will include the following:

- Chief Executive or Senior Manager to welcome the person to the company.
- Introduce to working colleagues in the office and show through office toilets, photocopier etc.
- Health and Safety issues, including fire alarm, security alarm, etc.
- First aid names and locations of first aiders and position of first aid boxes and rules for their use
- Introduction to MG ALBA's Health & Safety Policy, available on the Intranet for staff to read and understand during working hours.
- Line Manager to explain culture of the company and go over any Development Plans, explaining MG ALBA goals
  etc.
- Go over details of job description including working hours, holidays, pay, length of any probationary period, provision of any safety clothing and personal equipment.
- Discuss (if appropriate) the line management structure and who is in charge of what.
- Explain relationship with other Tenants in the building.
- Discuss review process timing and explanation.
- Any questions?

All staff who are deployed or assigned to a construction site or other hazardous site location are expected to attend any relevant site specific induction training provided for that location.

#### 4.7 Toolbox Talks

MG ALBA will carry out toolbox talks from time-to-time as an effective way of communicating health and safety topics and information. Attendees will be required to fill-in attendance registers as a formal method of recording their awareness of the presentation details.

# 4.8 Emergencies/Fire Safety

It is the policy of MG ALBA to treat the possibility of fire hazards in the workplace with the utmost priority. All employees must conduct themselves professionally and responsibly at all times in order to minimise the risk of fire.

All staff have a responsibility for maintaining safe places of work, particularly from the risk of a fire starting. Suitable training, competence, supervision and an emphasis on fire prevention means the risk of fire will be minimised.

#### If you discover a FIRE

- If you walk into any area and discover a fire, close the door and alert those in the immediate vicinity by shouting FIRE, FIRE, and activating a break glass point on your way out.
- If you have responsibilities in the event of a fire respond as required. If not then
- Leave the building by the exit door.
- Go directly to the assembly point in the carpark close to the satellite dish

#### When the fire alarm sounds you must respond without delay

- If you have responsibilities in the event of a fire respond as required. If not then
- Leave the building calmly by the exit door DO NOT RUN
- Do not stop to collect personal belongings.
- Close all doors (and windows where safe to do so) as you leave.
- Do not use any fire-fighting equipment unless you have been trained to do so and if you feel it's safe to do so.
- Go directly to the assembly point in the carpark close to the satellite dish
- Ensure everyone is escorted from the building and directed to the assembly point.
- You should remain at the assembly point unless directed otherwise by a responsible person or Fire Officer.
- Never re-enter the building unless authorised to do so, or while the alarm is still sounding.

MG ALBA will ensure a fire risk assessment of the premises will be carried out, under the Fire (Scotland) Act 2005, and will be reviewed annually or following any relevant changes to staffing or the premises.

Firefighting equipment will be provided in the form of portable fire extinguishers and fire blankets so that first aid fire-fighting can take place fairly quickly following the discovery of a fire. Procedures will be in place to properly maintain this equipment by checking it regularly and keeping appropriate records. A proportion of staff on the premises will be trained in fire safety awareness and in the use of portable fire-fighting equipment.

Staff must report any damaged or used extinguishers so that they can be repaired or replaced as quickly as possible. Emergency evacuation procedures have been posted so that personnel clearly understand what action they should take following a fire. Checks will be made to ensure these procedures are compatible with on-site arrangements.

All employees will be expected to report potential fire situations as quickly as possible, and must follow the proper evacuation procedures in the event of fire.

# 4.9 Work Equipment

All work equipment (including electrical equipment) used at work, as part of MG ALBA's undertaking will comply with the Provision and Use of Work Equipment Regulations (PUWER).

Before new equipment is introduced into the working environment, an assessment will be made by an appropriate member of staff in order to ascertain that the equipment is suitable for its intended use.

No employee will use work equipment for which they have not received specific training. No employee will knowingly misuse work equipment or remove any guards that are in place to minimise a specified risk. All work equipment will be

maintained and inspected at suitable intervals either internally by a competent person or by specialist external companies.

Any lifting equipment is only to be used by fully trained staff. All lifting equipment is to be inspected before use; any defects are to be reported to your supervisor. Lifting equipment should not lift more than its SWL (Safe Working Load). The SWL on all lifting equipment should be visible along with the last test date. Lifting equipment requiring occasional use will generally be hired in along with a competent operative where applicable.

When charging of batteries is being carried out there is a risk of fire or explosion from the acid and air mixing. The acid is hazardous to the skin and eyes and the correct personal protective equipment is to be worn. Sources of ignition are to be kept to a minimum. Sparks are to be avoided and the charger should be switched off before the battery is connected or disconnected from it.

Any maintenance / inspections undertaken on company equipment will be formally recorded with a hard copy left on file. Copies of all equipment maintenance manuals / operating instructions will be held centrally by the Office Manager

MG ALBA takes steps to reduce work equipment accidents by:

- ensuring that all cabling is securely fastened and safely routed
- ensuring that all consoles etc are securely fitted
- making access to dangerous parts difficult with the use of secure panels.
- restricting use of equipment to trained and authorised personnel only
- a planned preventative maintenance plan
- issuing personal protective equipment as the last resort.

If any faults or damage are found on any equipment, stop using the work equipment and report the fault to your Supervisor.

## 4.10 Display Screen Equipment (DSE)

The principal risks associated with DSE relate to physical (musculoskeletal) problems, visual fatigue and mental stress. All potential health problems can result from poor work organisation, working environment, job design and posture from inappropriate working methods. Therefore MG ALBA will prevent health problems by good design of the workplace, the job and through employee training and consultation.

The DSE user will be assessed to determine the extent to which any of the above health problems may occur whilst using their workstation and provide correct action as appropriate.

- a. <u>Computer terminal height</u>. The optimum height of a computer desk for operator comfort is approximately 28 inches from the floor to the normal rest position of the operator's fingers. This height permits the operator to sit with arms nearly horizontal, shoulders comfortably relaxed, and wrists at the proper angle.
- b. <u>Keyboard.</u> The keyboard should be located so that the upper arms hang straight down from the shoulders and the forearms are horizontal or lower.
- c. <u>Screen</u>. The screen should be placed in order that glare is kept to a minimum, the operator's line of sight is horizontal to 20 degrees down and falls comfortably in the upper half of the screen, and a distance of 15 to 20 inches from the operator's eyes is maintained.
- d. <u>Chair.</u> The chair should be in a position so that the thighs are permitted to rest approximately horizontal without being pinched by the front edge of the chair, the calves hang vertically, and the feet rest squarely on the floor or on a footrest.
- e. <u>Illumination</u>. A general room lighting level of 500-700 lux is normally recommended in the vicinity of computer workstations, but may need to be higher depending upon the visual demands of other tasks performed in the same work area. Glare is a common problem at computer workstations and can be very discomforting to the operator, as well as have a negative effect on productivity. To reduce glare, drapes, shades, and/or blinds over windows should be closed, especially during direct sunlight. The workstation should be positioned so that glare from windows and overhead lighting are not reflected on the screen. Screen hoods may be installed to shield completely or partially the screen from reflection. Anti-glare filters may be installed on the screen. Direct lighting fixtures may need to be recessed and baffles may be used to cover light fixtures to prevent the luminaries from

acting as a glare source, or special covers on light fixtures may be used to direct the light downward rather than allowing the light to diffuse.

DSE defined users (usage in excess of approx. 1 hour) are entitled to an eyesight test, eye examination and special corrective spectacles where requested by the examining optician (and on receipt of written confirmation). The eye sight test will be funded by the company in full and arrangements can be made through the Office Manager.

## 4.11 Electricity

MG ALBA will test the buildings electrical installation every five years. The electrical systems within the premises were completely renewed or upgraded in 2013. Test certificates are available.

#### Portable Electrical Appliance Testing (PAT Testing)

All portable electrical appliances will be tested for safety in accordance with the HSE's guidance document Maintaining Portable Electric Equipment in Low Risk Environments. Test records for all such inspections will be maintained an a Pat Testing folder held by the Office Manager.

All users are responsible for ensuring that there is no visible damage to the electrical equipment, leads and plugs, which they use. They should report any fault or damage to their supervisor as appropriate. Faulty or damaged electrical equipment should be labelled as such and should be immediately taken out of use by physical removal, removal of the plug, or equivalent means of ensuring that it cannot be used.

# 4.12 Working at Height

In order to comply with the Work at Height Regulations 2005 MG ALBA will plan and organise any work at height required by carrying out a suitable and sufficient assessment of the risks involved with the works. The aims will be to comply with the hierarchy by:

- avoiding working at height wherever possible
- use an existing safe place of work
- provide fall prevention equipment
- provide equipment to mitigate the distance and consequences of a fall
- provide instruction, training, information and supervision

# 4.13 Hazardous Substances (COSHH)

Before any hazardous substances are used during a work process, a material data safety sheet will be requested from the supplier and an appropriate risk assessment made, which covers:

- Activity description
- Location
- Persons at risk
- Substance, process and manufacturer
- Classification of substance
- Hazard type and route of exposure
- Stated risks
- Control measures
- Any decanting to be into clearly marked containers
- PPE, First Aid, Storage, Disposal, Risk Rating
- Signed and dated by assessor

Alternative less harmful substances will be used wherever possible. COSHH Risk Assessments will be available from the Office Manager.

# 4.14 Manual Handling

Manual handling operations will be risk assessed to determine suitable control measures for the management of risk and the company will endeavour to eliminate manual handling operations where practicable with any remaining risks being controlled by;

- reducing weights
- reducing the frequency of manual handling
- the use of additional manpower

- through the provision of suitable equipment to assist in the operation
- the selection of persons to carry out manual handling or lifting tasks will be based on the training given, age, physique etc.

# 4.15 Monitoring/Safety Inspection

A standard checklist is used when conducting health and safety inspections in order to verify that operating conditions do not adversely affect the health and safety of employees and others. From these inspections any recommendations are distributed to key personnel with an appropriate action column to ensure remedial work is progressed. A report is then completed and distributed to key personnel for implementation. These reports are reviewed by the H&S Advisor to verify that all recommendations have been satisfactorily implemented. MG ALBA will aim to be proactive at all times to monitor health and safety standards and practices.

#### 4.16 Risk Assessments and Method Statements

The Health and Safety Advisor will carry out and record formal risk assessments. In addition risk assessments can be carried out continuously by employees throughout their work. Hazards are considered and work methods established to minimize the risk of injury to themselves and others affected by the work.

Where the employee does not have sufficient knowledge about a specific hazard, such as work in confined spaces, they will take further advice from the H&S Advisor if required. MG ALBA will ensure staff are provided with appropriate instruction and training on risk assessments.

Copies of all Risk Assessments and Method Statements generated are required to be lodged with the Office Manager who will maintain an indexed, numeric file. All staff will have access to the file, however, the file itself should remain at the Office Managers workplace. Copies of relevant information can be taken from the file. All information will also be available on the Intranet.

## 4.17 Unsatisfactory or unsafe conditions

The following procedure has been established for reporting unsatisfactory conditions

- Employees have been instructed to report unsafe conditions or acts to their Line Manager so that remedial action can be taken
- If the condition prevails without a clear explanation as to why it has not been actioned, the employee should raise the matter with his/her immediate Supervisor.
- The communication channels outlined above must always be followed when reporting such matters in order to avoid misunderstanding or confusion.

## 4.18 Safe Working Procedures

Where tasks are identified as being potentially hazardous and could lead to serious injury or result in ill-health then appropriate measures must be taken to ensure that suitable safe working procedures are put in place, i.e. working at heights. A written safe system of work or Method Statement will be drawn up and implemented for each of these jobs, which details the necessary precautions to eliminate the risks.

MG ALBA will ensure that any such documentation is available to appropriate staff. Such procedures are issued on a jobby-job basis and the staff involved in the work receive appropriate instructions on the correct application of these procedures. Staff are expected to work strictly in accordance with the Method Statement; they will be required to sign up to any such documentation.

## 4.19 Consultation with Employees

MG ALBA is committed to the requirement that their employees be consulted on matters affecting their health and safety in the workplace. MG ALBA discharge the duty to consult through a Health and Safety Consultative Committee. The primary function of the Health and Safety Consultative Committee is to allow for Employee Consultation and is referred to in more detail at paragraph 3.4.

MG ALBA will bring to the attention of their employees any safety-related issues through safety meetings, safety bulletins or toolbox talks. At all times employees will be consulted on health and safety issues.

## 4.20 Health and Safety Documentation

MG ALBA will ensure that all employees have access to health and safety documentation prior to any work commencing. This will include the Company Health and Safety Policy Document, Method Statements, Risk Assessments, Safe Working Procedures as well as any other health and safety document which may be applicable.

#### 4.21 Methods of Communication

MG ALBA will utilise various methods of passing information and the safety message to their employees. This will be done via the intranet, quarterly staff meetings and safety notices/bulletins to employees as well as displaying them on notice boards in prominent positions.

## 4.22 Housekeeping

All employees will strive to maintain a clean and tidy workplace. It is established that poorly kept workplaces can lead to slips, trips and other accidents. All employees should follow the 'See it, Sort it' philosophy, in particular:

- Keep walkways clear
- Don't obstruct stairways
- Store materials safely
- Clear up after yourself regularly
- Keep vehicles in a clean, tidy condition

#### 4.23 Violence

During the course of the works undertaken MG ALBA there will be interaction with the general public, customers, visitors and therefore violence towards employees is a possibility at work. Violence at work is defined as "any unacceptable unsociable behaviour, including verbal and physical abuse, assault and bullying to any person whilst they are at work".

All incidences of violence at work are to be reported to the Chief Executive immediately. In consultation with the person suffering from the violence and with their agreement the Police will be invited to deal with the incident. Employees, subcontractors and any other contracted individual associated with the Partnership will have their contract terminated immediately when they are found to have committed acts of violence, on the investigation and at the discretion of the Chief Executive.

## 4.24 Smoking

MG ALBA expects its employees, visitors, subcontractors and any other individual on its premises to abide by the smoking ban for all places of work, enclosed public spaces and vehicles as enforced in March 2006. Any person found to be ignoring this legislation will be subject to the MG ALBA's disciplinary procedures. MG ALBA will aim to provide legal areas for smoking wherever possible.

Further information on the Smoking Policy is available in the Company Handbook section 7.11.

# 4.25 Driving MG ALBA vehicles and own vehicles

MG ALBA vehicles are defined as any vehicle owned or hired by MG ALBA which will be driven on the public highway and is thus subject to the Road Traffic Act (RTA). Any vehicle driven whilst the driver is on MG ALBA business is classed as a place of work.

Employees required to drive an MG ALBA vehicle as part of their duties will be a holder of a full licence for the type of vehicle they are to drive and been driving for at least 12 months since passing their test. All disqualifications, endorsements and incidents must be informed in writing to the Management Accountant as soon as possible after the event. All MG ALBA vehicles must be driven with due care and attention, within the requirements of the RTA, Highway Code and other legislation in relation to driving of vehicles such as the use of mobile phones.

Further information on the use of mobile phones while driving is available in the Company Handbook section 7.9.

Licence checks will be carried out on a regular basis on all employees required to drive MG ALBA vehicles. Licence, V5 (registration), MOT and insurance documents will be checked for private vehicles being used on MG ALBA business.

All users of MG ALBA vehicles are required to ensure the vehicles are maintained to a high standard of cleanliness and all maintenance work is carried out in accordance with relevant terms and conditions.

Employees who drive their own vehicles on work-related business must ensure that they are insured to drive that vehicle for work purposes and will be asked to self-certify on that basis when they make mileage expenses claims. Employees may also be asked to demonstrate proof of insurance when making a travel authorisation request. It is the responsibility of the employee to ensure their vehicles are road-worthy and comply with all legal requirements.

Employees should not travel in hazardous weather on work-related business.

#### 4.26 Asbestos

You should always presume any material contains asbestos unless there is strong evidence to suggest it does not. Asbestos containing material (ACMs) may be present if a building was constructed or refurbished before 2000. All asbestos use was prohibited by 1999. Some material obviously does not contain asbestos such as glass, solid wooden doors, floorboards, bricks and stone.

Breathing in air containing asbestos fibres can lead to asbestos-related diseases, mainly cancers of the lungs and chest lining. Asbestos is only a risk to health if asbestos fibres are released into the air and breathed in. Past exposure to asbestos currently kills around 4000 people a year in Great Britain. There is no cure for asbestos-related diseases. There is usually a long delay between first exposure to asbestos and the onset of disease. This can vary from 15 to 60 years. Only by preventing or minimising these exposures now will asbestos-related disease eventually be reduced.

There are three main types of asbestos still found in premises. These are commonly called 'blue asbestos' (crocidolite), 'brown asbestos' (amosite) and 'white asbestos' (chrysotile). All of them are dangerous carcinogens, but blue and brown asbestos are more hazardous than white. You cannot identify them just by their colour. Anyone who disturbs asbestos that has deteriorated or been damaged and is releasing fibres, can be at risk. In fact, anyone whose work involves drilling, sawing or cutting into the fabric of premises could potentially be at risk. They may all breathe in asbestos fibres during their day-to-day work.

Some ACMs are more vulnerable to damage and more likely to give off fibres than others. In general, the materials which contain a high percentage of asbestos are more easily damaged. The list below is roughly in order of ease of fibre release (with the highest potential fibre release first). Sprayed coatings, lagging and insulating board are more likely to contain blue or brown asbestos. Asbestos insulation and lagging can contain up to 85% asbestos and are most likely to give off fibres. Work with asbestos insulating board can result in equally high fibre release if power tools are used. On the other hand, asbestos cement contains only 10-15% of the asbestos types. The asbestos is tightly bound into the cement and the material will only give off fibres if it is badly damaged or broken or is worked on (eg drilled, cut etc).

You are most likely to come across asbestos in these materials:

- sprayed asbestos and asbestos loose packing generally used as fire breaks in ceiling voids;
- moulded or preformed lagging -generally used in thermal insulation of pipes and boilers;
- sprayed asbestos generally used as fire protection in ducts, fire breaks, panels, partitions, and on asbestos cement sheets around structural steel work;
- insulating boards used for fire protection, thermal insulation, partitioning and ducts and as soffits and as ceiling or wall panels;
- some ceiling tiles;
- millboard, paper and paper products used for insulation of electrical equipment. Asbestos paper has also been used as a fire-proof facing on wood fibreboard;
- asbestos cement products, which can be fully or semi-compressed into flat or corrugated sheets. Corrugated sheets are largely used as roofing and wall cladding. Other asbestos cement products include gutters, rainwater pipes and water tanks;
- certain textured coatings;
- bitumen roofing material; and
- vinyl or thermoplastic floor tiles.

Any MG ALBA staff likely to attend on building sites, buildings being demolished or buildings in disrepair are required to attend short duration training in asbestos awareness which will cover related issues including legislation overview, general asbestos overview and emergency procedures.

In the event of coming across suspected asbestos containing material and possible contamination from asbestos containing material the following emergency procedures should be followed, depending on the level, or potential level of asbestos fibre release:

- Stop work immediately
- Keep everyone else out of the work area
- Report to person in charge asap
- Remove clothing, put into a plastic bag and seal bag
- Wash thoroughly straight away or take a shower.
- Leave the washing facilities clean
- Put up a warning sign 'Possible Asbestos Contamination'
- o Identify cause of possible release asap
- o Implement adequate control measures asap.

# 4.27 Working in roofs with MMMFs

Some MG ALBA staff may come into contact with man-made mineral fibres (MMMFs) when disturbing or moving mineral wool or glass wool, usually in the form of loft insulation. As the extent of disturbance is likely to be very low, no special precautions are envisaged. However if there requires to be more extensive disturbance of insulation the following precautions should be taken:

- o Hand protection: Not normally required but suitable gloves can be worn.
- Eye protection: With heavy dust development or when working with product above head height, the use of safety goggles is advised.
- o Skin protection: No special requirements: loose fitting, long-sleeved, long-legged, work clothes advised.
- Respiratory protection: a face mask meeting EN 149 (FFP1), ensuring your mask gives a good fit around your face

#### 4.28 Contractors

All contractor staff visiting the building for the first time will be required to go through the visitor induction process. The induction process is designed to help maintain the safety of persons in and around the building and to provide suitable information on their first visit. Further visits will only require signing in and out, unless the induction process has been reviewed or updated.

Where appropriate, a Permit to Work system for construction, maintenance, repair etc will be in use, generally as follows;

- A General Permit to Work will not be required for minor work in the more visual general and circulation areas such as door repairs and repairs to welfare facilities.
- A General Permit to Work will be required for any work in the plant rooms, loft spaces, roof voids etc

Before work commences on MG ALBA premises, the particular health and safety aspects of the work must be fully discussed with the Facilities Assistant so that all associated risk can be identified, and appropriate preventative procedures planned and introduced. The contractor is required to provide a copy of their Health and Safety Policy Statement or provide a suitable and sufficient Method Statement.

## 4.29 Discipline

It is MG ALBA's policy that the compliance with Health, Safety and Environmental legislation by all employees forms part of their conditions of employment. Where there is clear evidence of a persistent or serious breach of these safety responsibilities then the individual will be subject to the MG ALBA's disciplinary procedures. In serious cases of misconduct which are likely to endanger life or adversely affect the health and safety at work it may be necessary to terminate employment immediately under Gross Misconduct.

## **Examples of gross misconduct**

- Fighting, physical assault, violent conduct or dangerous horseplay.
- Sexual, racial or other harassment or bullying
- Failure to carry out a reasonable and lawful direct instruction given by a superior during working hours.

- Gross insubordination.
- The use of aggressive behaviour or excessive bad language.
- Theft, wilful damage or negligence, which leads to damage of property belonging to MG ALBA or other employees.
- Falsification of MG ALBA records (including timesheets, clock cards, expenses claims, etc.).
- Wilful acts of damage when representing MG ALBA or engaged on MG ALBA business.
- Performing, arranging or carrying out work or activity, which could be considered to be in competition with or which adversely affects in any way MG ALBA's interests.
- Fraud or any other offence committed against MG ALBA, which would be a breach of the law of the land.
- Attending work while intoxicated by alcohol or non-medically prescribed drugs.
- Acts of gross negligence or misconduct involving carelessness or reckless driving.
- Loss of driving licence on conviction when driving is all or an essential part of the job requirements.
- Serious breach of legal limits when driving MG ALBA vehicles.
- Breach of safety rules and/or any action, which seriously endangers the health or safety of an employee or any other person whilst at work.
- Deliberately making a false entry in the written records of MG ALBA.
- Knowingly giving false information or deliberately omitting relevant information on the job application form or curriculum vitae.
- Partaking in discrimination or harassment.
- Smoking in designated non-smoking areas
- The viewing or downloading of pornographic or other derogatory, defamatory, obscene or inappropriate material from internet/e-mail systems.
- Unauthorised access to, or disclosure of, any confidential information.
- Abuse of internet/e-mail systems/telephone for personal usage.
- Bribing or being bribed whilst employed by MG ALBA.

The list above is not exhaustive. Acts of breaches of duty or other substantial reasons comparable to any of the above may constitute gross misconduct.

This list may be amended or modified by the Company to keep pace with legislation, legal practice and interpretation and general standards of conduct in society.

#### 4.30 Legionella

Under current legislation and regulations MG ALBA as a landlord has a responsibility to assess and control the risks due to legionella bacteria. MG ALBA must ensure that:

- The risk of exposure to legionella in the premises is properly assessed and controlled.
- All water systems with the potential to be a source for legionella bacterial growth will be assessed. Assessments will be carried out by competent staff, or a competent external contractor.

If the assessment shows the risks are low and are being properly managed, no further action is needed but it is important to review the assessment regularly in case anything changes in the system. Simple control measures can help control the risk of exposure to legionella such as:

- Flushing out the system prior to letting the property
- Avoiding debris getting into the system (e.g. ensure the cold-water tanks, where fitted, have a tight-fitting lid)
- Setting control parameters (e.g. setting the temperature to ensure water is stored at 60°C)
- Make sure any redundant pipework identified is removed.

Tenants will be advised of any control measures put in place that must be maintained, such as:

- Not to adjust the temperature setting of the calorifier/heater
- Inform MG ALBA if the hot water is not heating properly or there are any other problems with the system so that appropriate action can be taken

Where showers are installed, these have the means of creating and dispersing water droplets which may be inhaled causing a foreseeable risk of exposure to legionella. However, if used regularly the risks are reduced, but it is advisable

to regularly clean and disinfect showerheads. Electric showers pose less of a risk as they are generally cold-water fed and heat only small volumes of water during operation.

It is important that water is not allowed to stagnate within the water system and there should be careful management of the building to ensure that outlets on hot and cold-water systems are used at least once a week to maintain a degree of water flow and minimise the chances of stagnation.

#### **System and Controls**

MG ALBA must ensure that there is a documented Management System for the property available for audit or review. This should include any maintenance or monitoring records available. The following roles/persons and their contact details will be identified or appointed and recorded:

Statutory Duty Holder: CEO

Responsible Person: Office Manager.

Authorised Deputy: Facilities Supervisor

Maintenance Provider: The appointed Contractor

#### Maintenance and Monitoring (to be recorded):

- Identify any little-used outlets including showers (typically unused for one week or longer) and implement a flushing register. Little-used outlets should be flushed for approximately 2 minutes per week to reduce risks of water stagnating.
- Identify sentinel outlets (i.e. sinks nearest and furthest cold and hot water sources) and monitor hot and cold water temperatures on a monthly basis. Cold water should be below 20°c after 2 minutes, Hot water should be above 50°c after 1 minute.
- Ensure showers and showerheads are being cleaned and disinfected on at least a quarterly basis.

#### 4.31 Visiting Children Policy

MG ALBA recognise that there may be occasions when employees may wish their children to visit during working hours. MG ALBA also recognise that these premises are work premises, with hazards of varying degrees present, from which the employer has a duty under law to protect employees and all others who may be present.

Children are not allowed past the door at the reception area unless escorted by a parent or guardian. If employees based in the studio area wish to have their children in the building, then they must take them upstairs for the duration of their visit.

With this in mind, employee's children are only allowed in the premises on the following conditions and where possible line managers should be informed in advance:

- the visit will be of short duration and no longer than 2 hours.
- they must be signed in and out
- they are not to be unattended at any time
- no unattended use of the stairs or lifts
- they should not interfere with any equipment
- they should not be allowed to distract colleagues
- they are not allowed under any circumstances in the Studio, Plant Rooms or Technical Areas

Parents or Guardians must take responsibility for their children.

## 4.32 Bomb threat or suspicious package

Separately circulated.

#### 5. WELLBEING AT WORK

#### 5.1 Illness and Absenteeism

All illnesses, sick leave and days off work must be reported by the absent individual to the relevant Line Manager at the earliest opportunity on the day of non-attendance wherever possible, preferably prior to start time. The individual must inform of the reason for non-attendance and obtain a doctor's note for a period over 7 days. Accident Reporting is referred to at paragraph 4.4. The Line Manager must then inform the Office Manager.

## 5.2 Equal Opportunities

MG ALBA operates a policy to provide equal opportunities for employment in accordance with the Equality Act 2010. This ensures that any opportunity for employment with MG ALBA is not restricted by an applicant's ethnic origin, nationality and race, colour, religion, sex, disability, appearance or social status. No employee of MG ALBA be discriminated against for any of the aforementioned.

## 5.3 Expectant or Nursing Mothers

If any type of work could present a particular risk to expectant or nursing mothers, a risk assessment must be undertaken to highlight any hazards and control measures required. If the risks are unavoidable, then the woman's working conditions will be altered to avoid the risks. Alternatively, she must be offered other work or suspended from work on full pay.

Pregnant employees must notify MG ALBA in writing that she is pregnant, has recently given birth or is breastfeeding. Pregnant workers should not be exposed to chemical or biological hazards, excessive manual handling, passive smoking, lack of welfare facilities, excessive temperature, excessive working hours, stress, violence and poor ergonomic working environment.

## **5.4** Young Workers

The Management of Health and Safety at Work Regulations 1999 defines any young person as anybody under the age of 18 and stipulates that a special risk assessment must be undertaken prior to the young person commencing their employment, particularly as apprentices and for work experience. If the young person is 16 years or less, the parents or guardian must be notified of the details of the risk assessment and of any safeguards to be installed. The risk assessment should cover:

- details of the work activity, including equipment or hazardous substances
- details of any prohibited equipment or processes
- details of health and safety training to be provided (particularly induction)
- details of supervision arrangements (mentor)

Young persons may lack experience and risk awareness. They can be subject to peer pressure and liable to work too hard to impress. Induction training on site rules, restricted areas, prohibited machines, fire precautions and any further related training should be provided. Young persons should not be given tasks that:

- exceed their mental and physical capabilities
- expose them to toxic or carcinogenic substances
- expose them to radiation, extremes in noise, vibration and temperature
- involve the use of hazardous machinery and equipment

## 5.5 Workers with Disabilities

Special risk assessments should provide details and appropriate control measures to protect disabled workers. Disabilities may include poor hearing, poor sight and wheelchair access and circulation. Wherever appropriate MG ALBA will provide adequate facilities and safety control measures for employees with disabilities and comply with our Equal Opportunities Policy, company Handbook 7.5.

#### 5.6 Lone Workers

#### **Policy**

A colleague who is working alone should not be more at risk than any other employee.

Colleagues who wish to work alone should first complete a Lone Working Risk Assessment and obtain input and sign off from an authorised person. As well as considering the risks, the Lone Working Risk Assessment must consider the health of the individual and their suitability for working alone in the proposed circumstances.

The Lone Working Risk Assessment should set out the control measures required to ensure the wellbeing and safety of the lone worker.

The lone worker is responsible for ensuring that the proposed lone working does not take place if there is any doubt about their safety or if the agreed control measures have not been implemented.

#### Scope

This policy applies to all employees of MG ALBA who may be working alone, at any time, in any of the situations described in the procedures below.

A lone worker is an employee who is performing an activity in isolation from other workers and who may be exposed to risk because there is no-one to assist them if required. Isolation can be physical isolation (including working alone in a building) or personal isolation (including business travel and attending events).

#### **Risk Assessment**

The Lone Working Risk Assessment needs to confirm whether the employee can safely work in an unaccompanied environment. Consideration should be given identifying hazards, such as:

- the remoteness or isolation of workplaces
- the location of the working environment, security, access, other factors
- the context, nature of their tasks, any special circumstances such as political or social unrest when overseas
- communication or connectivity risks
- the possibility of interference, such as violence or criminal activity from other persons
- the risk to personal safety while travelling for business purposes
- exposure to health risks in particular circumstances or countries.

The Risk Assessment should take all available information into account.

If circumstances change in the course of the lone working, Risk Assessment should be updated as necessary with adequate control measures.

The authorising person should not sign off on the Risk Assessment if there is ongoing reasonable doubt about the safety of a lone worker in a given situation. In those circumstances, consideration should be given to putting a second worker in place or making other arrangements to complete a task. Safety must be the prime concern.

Only trained line managers, the Office Manager and the Health & Safety Adviser are authorised to sign off on a Lone Working Risk Assessment.

A standard template Lone Working Risk Assessment is attached to this Policy.

Completed Risk Assessments for Lone Working are collated by the Office Manager and are saved here.

## **Lone Working Guidance and Procedures**

## **Guidance on Personal Safety**

- Colleagues should take all reasonable precautions to ensure their own safety, as they would in any other circumstances.
- Before working alone, colleagues should assess the risks in conjunction with their line manager and should record the agreed control measures in the Lone Working Risk Assessment.
- Colleagues should inform their line manager or other identified person when they will be working alone, giving
  accurate details of their location and informing that person when the task is complete. This includes occasions
  when a colleague expects to return home following an external appointment rather than returning to the office
  base.
- Line Managers must ensure that there is a robust system in place for maintaining contact with lone working colleagues who report to them.
- Colleagues who are working at home should maintain communication with their line manager in terms of their diaries, appointments and work plans.
- If a colleague does not report for work as expected, their line manager should check on the welfare of the colleagues and then respond as appropriate
- Where colleagues work alone for extended periods and / or on a regular basis, managers must make provision for regular contact, both to monitor their situation and to counter the effects of working in isolation.
- Colleagues working in the community, or out of the office regularly, should be issued with a company mobile
  phone. They are responsible for checking that it is charged and in full working order, with back up battery packs
  if appropriate. Consideration may also be given to the issue of personal alarms, but in general colleagues are
  discouraged from lone working in circumstances where such alarms may be needed.

### **Safe Working Procedures**

You should be familiar with the Lone Working Policy and the following Procedures for after-hours working in 54 and 56 Seaforth Road and for working away from the office.

### <u>After Hours Work – Stornoway Office</u>

The building is normally secured at approx. 9.30pm Monday to Thursday and at 7pm on Fridays. Any person working on their own in the building out with these hours or on Saturday and Sunday will be considered as Lone Working.

- 1. Complete a Lone Working Risk Assessment and obtain sign off from an authorised person. You may do this once to cover an expected work pattern for a period of time, but if so, you must remember to update it for new risks, hazards and control measures, as appropriate.
- 2. Before starting a period of lone working, inform your line manager that you intend working alone, giving your approximate finish time.
- 3. Call your line manager when you have finished work and have left the building or wish to extend your approximate finish time.
- 4. Ensure the building is secure before you leave.
- 5. If you have not made the call, your line manager should call you and check on your situation within an hour of your approximate finish time.
- 6. If there is no response, your line manager will be required to come into the building and check on the situation or ask another member of staff to do so.
- 7. It is therefore imperative that good communications are maintained.

#### Working away from the Office

- 8. MG ALBA expects all colleagues to work in a collaborative way. As such your workplan and travel plans should be known to your manager and colleagues. It is good practice to let your manager, or other appropriate colleague, know when you are leaving the office, what your mode of transport is and when you expect to return.
- 9. Your electronic diary is an important tool in fostering collaborative working and you should ensure that all external business appointments and their location are entered. The electronic diary should be accessible to your line manager and colleagues with whom you work regularly. Private appointments in work hours (eg doctor appointments) should be noted as "private" so that that line managers and colleagues will know not to consider those absences as lone working away from the office.

- 10. If your plans change at short notice, you should change the details on your electronic diary (using your mobile phone) and, if appropriate, let colleagues know by phone, email or text.
- 11. All employees travelling on work-related business should have mobile phones and their contact numbers should be held by the Office Manager and all relevant colleagues.
- 12. Should you be more than an hour late in returning to the office and you have not advised anyone, your line manager or colleagues expecting your arrival will make efforts to establish your whereabouts
- 13. Basic first aid kits and fire extinguishers should be carried in MG ALBA owned vehicles. Employees using their own private vehicles for MG ALBA business must have business use insurance and are strongly recommended to carry a First Aid kit and fire extinguisher.
- 14. Appropriate PPE must be worn for the environment to be visited.
- 15. Observe all location safety rules; sign in and out as required by the policies of the location, and do not tamper with any Work Equipment you are not authorised to use. Prior to using any authorised Work Equipment, check that all safety conditions are met.
- 16. You are under no obligation to enter a property or continue working where it is obvious that a person or persons in the property are under the influence of drink or drugs.
- 17. If there is any concern about the behaviour of persons on the premises or any suggestion of aggression, you should leave the premises immediately and report the matter to the office.
- 18. You should not enter houses where only young children, and no adults, are present
- 19. If a person answers the door in a state of undress, you should make your excuses and leave, with a view to rearranging another visit, through the office.

#### **Information and Training**

You will be given the appropriate information and training to enable you to recognise the hazards associated with lone working and to implement control measures, including the provision of first aid, communication procedures and awareness of emergency procedures.

If you require additional support or training to comply with the Lone Working Policy or safe working Procedures, please identify this at the earliest possible moment and please report any concerns to management.

## Reporting

Should an incident occur, the reporting and debriefing should follow standard company Health & Safety guidance.

## Responsibility

The Office Manager is responsible for the implementation of this Lone Working Policy & Procedures.

## **Contractors and Tenants**

Contractors and tenants are subject to the parts of this guidance that relate to working within MG ALBA premises. The Office Manager is responsible for ensuring contractors and tenants are provided with the information and training needed to enable them to comply.

Note: Risk Assessments are carried out in terms of the Management of Health and Safety at Work Regulations 1999

# 5.7 Flexible Working Policy

#### Introduction

Eligible employees have the legal right to submit a formal request for flexible working and the Company will deal reasonably with such requests. MG ALBA acknowledges the importance for employees in achieving a balance between work and personal commitments and will endeavour to grant requests where possible.

The Company will place restrictions on the operation of flexible working if it deems it necessary for the proper conduct of its business and in accordance with the permitted statutory grounds for refusal. The Company reserves the right not to agree to the request where one or more of these criteria indicate that, in the current circumstances, the job can only be carried out effectively under current arrangements.

The statutory procedure requires that requests for flexible working (including any appeal process) are dealt with within three months of the written application, although this timescale may be extended by agreement. Where possible the Company will ensure that decisions are made well within this timescale.

This policy does not form part of any employee's contract of employment and the Company may amend it at any time.

## Eligibility

In order to be eligible to request flexible working you must:

- be an employee (not an agency worker or office holder)
- have at least 26 weeks' continuous employment with the Company at the date the application is made
- not have made a request under the statutory scheme for at least 12 months

## Scope of a Request

If you are an eligible employee, you have a legal right to request:

- a change to your hours of work
- a change to the times you are required to work
- a change to your place of work

Any change to your terms and conditions made as a result of a flexible working request will be permanent, unless we agree to a temporary variation.

## **Content of your Request**

Flexible working can incorporate a number of changes to working arrangements such as a reduction or variation in your working hours, reducing the number of days you work each week and/or working from a different location i.e. from home

You may therefore request a variation of your employment contract in respect of, for example:

- the hours you are required to work
- the times when you are required to work
- part-time working
- job-sharing
- working term-time only
- working shifts
- where you are required to work (as between your home and places of business of the Company).

You have the right to have the request dealt with reasonably, but this does not give you a right to a contract variation.

## **Procedure**

If you decide to make a flexible working request, you must follow this procedure. However, before making an application you should think about:

- what working pattern will help you best achieve your aims
- the financial implications a change might have on you
- what effects, if any, the change will have on the Company's business and how these might be accommodated.

Your application must be submitted to your manager and must:

- be made in writing and dated
- state that it is an application under the statutory right to apply for flexible working arrangements
- state whether a previous application has been made by you to the Company and, if so, when
- specify the change applied for and the date on which it is proposed that the change should become effective
- explain what effect, if any, you think making the change applied for would have on the Company and how, in your opinion, any such effect might be dealt with.

Your manager may agree to the formal request without discussing it with you (for example, if the details of your request have already been discussed informally).

In most cases your manager will arrange to meet with you promptly after receiving the application.

## Meeting

The time and place of the meeting will be convenient to both you and your manager.

A work colleague may accompany you at the meeting. That employee will be permitted to confer with you during the meeting and to address the meeting (but not to answer questions on your behalf).

If your chosen companion will not be available at the time proposed for the meeting and you propose an alternative, mutually convenient time, the manager will postpone the meeting to the time proposed by you. Alternatively, you should consider choosing another companion.

At the meeting the requested variation to your working arrangements will be discussed fully. The impact of the change, and your ideas for how any adverse impact could be minimised, will be considered. The meeting also provides the opportunity to discuss any alternative variations which would be acceptable. Your manager may suggest implementing an agreed trial period for the new arrangements.

## Agreement

If the Company agrees to the application, you will receive written confirmation which will specify the contractual variation agreed to and state the date on which the variation is to take effect.

Once the Company has agreed to the changes requested in your application, a permanent variation of your contract will result, unless your manager agrees otherwise. Once a change has been made, you cannot revert to the previous terms and conditions of your employment.

You may make further applications for variations (whether your first application was successful or not) provided they are made at least 12 months after the previous application.

## Refusal

If your request is refused, the written notice will identify on which of the permitted grounds (listed below) the application was refused. The letter will also provide an explanation as to why those grounds apply and set out the appeal procedure.

The application may be refused on one or more of several grounds, these being that the proposed changes will result in:

- a burden of additional cost
- a detrimental effect on ability to meet customer demand
- an inability to re-organise work among existing staff
- an inability to recruit additional staff
- a detrimental effect on quality
- a detrimental effect on performance
- an insufficiency of work during the periods you propose to work
- a planned structural change

any other ground allowed by regulations.

In deciding whether the above grounds are met, a wide range of criteria will be taken into account, including (by way of example only) the following:

- the Company's business needs
- the suitability of the job for the flexible arrangements proposed, e.g. the nature of the work, the hours needed and the need for continuity and consistency
- the current balance of full-time and part-time employees and other flexible working arrangements within the team
- the feasibility of covering the remaining hours

#### Withdrawal of Application

The Company can treat an application as withdrawn under the statutory provisions where you have:

- notified your manager, orally or in writing, that the application is withdrawn
- without reasonable cause, failed more than once to attend a meeting or appeal meeting
- without reasonable cause, refused to provide your manager with information required in order to assess whether the contract variation should be agreed to.

Your manager will confirm the withdrawal of the application to you in writing unless you have already provided written notice of the withdrawal. You will not be entitled to make another formal application until 12 months after your original request.

#### **Appeal**

It is the Company's policy to allow an appeal against a decision to refuse an application for flexible working. If you wish to appeal, you should do so within 7 days after the date on you were notified of the decision. The notice of appeal must be addressed to your senior manager in writing, setting out the grounds for appeal.

Your senior manager will hold a meeting with you to discuss the appeal. The time and place of an appeal meeting will be convenient to both you and the Company. You have the same right to be accompanied by a work colleague as at the initial meeting.

After the appeal meeting your senior manager will write to you with a decision. If the Company upholds the appeal the letter will specify the contract variation agreed to and state the date on which it is to take effect. If the Company dismisses the appeal, the letter will state the grounds for the decision and contains an explanation as to why those grounds apply.

## 5.8 Agile Working Policy

## Introduction

MG ALBA recognises the need to continually develop modern working practices, with the aim of implementing flexibility that can enable employees to maintain a stronger work life balance. It also recognises that there may be occasions where increased flexibility can be of great assistance to employees in both undertaking their role and balancing outside commitments.

Agile working is a term used to describe employees conducting their usual job role from varied locations which can include but are not limited to the usual place of work. MG ALBA expects that, with this added degree of flexibility, employees will be better equipped to respond to, and manage, the demands of everyday working life alongside any temporary additional demands they may face due to external factors.

This policy outlines ways in which employees can work in an agile way from varied locations. It provides a framework of consistent and fair practices on issues that need to be taken into account when considering agile working.

## **Scope of this Policy**

This policy applies to all employees of MG ALBA, subject to the exceptions and eligibility requirements outlined below. To be eligible to be considered for agile working, employees generally need to meet the following:

- their role must not involve supervisory duties that require undertaking in person alongside the team members involved that would be adversely affected by agile working
- their home environment must be deemed suitable
- their recent appraisal must not have been marked as unsatisfactory
- their disciplinary record must be clean

It should be understood that the nature of agile working will depend upon the specific role of the employee concerned. All forms of agile working must be cost effective and not serve to increase the workloads of other members of staff. Considerations of its implementation will take into account business need and the specific requirements of its clients and stakeholders.

Where employees meet the above eligibility requirements and fall into the same team, or are undertaking work on the same project, they will be treated consistently to ensure they have the same entitlements.

Ultimately, the final decision on whether agile working will be permitted in any given situation will rest with MG ALBA. Its length and application will also be set by MG ALBA in consultation with the employee.

## **Benefits of Agile Working**

MG ALBA recognises that agile working provides numerous benefits, both to management and to its employees. This can include, but is not limited to, the following:

- Trust in the working relationship
- Flexibility on contract hours
- Freedom to choose how / when you work
- Maintaining employee safety
- Improved employee morale
- Increased productivity
- Wellbeing at work including exercise and healthy working practices
- Assisting in maintaining social distancing measures due to decreased numbers
- Enabling staff to continue conducting their role if the usual place of work becomes temporarily unavailable to them
- Providing vulnerable staff with the option to keep working whilst also protecting their own health through continued isolation.
- Reduced commute brings time and cost efficiencies
- Increased time and availability for our families
- Better work / life balance & management of the boundaries
- Use of technology to bring optimum levels of collaboration
- Equality of voice in all our communications
- Valuable working community bringing social interaction, support, ideas and inspiration

### **Types of Agile Working**

Agile working will be granted to employees, in consultation with their line manager and under the guidance of the Business Continuity Team with regards to staff safety.

Management and Business Continuity will refer to the following 5 key principles in providing such guidance:

- Safety
- Belonging
- Comfort
- Productivity
- Control

There may be different ways in which agile working will be permitted will dependent upon the needs and requirements of MG ALBA. Generally, it will permit the following arrangements:

- Homeworking for part of the week / month
- Working from the office part of the week / month
- Working from the office full time
- Working from home full time (with an agreement to attend the office a minimum no. of [xx] days per month to keep continued engagement levels high)

Working at a different office / site or in the community

## **Manager Responsibility**

It is the responsibility of management to determine the work styles of agile working that will apply to specific posts. They will give careful consideration to all necessary information to determine which work styles the post in question could fall into. Steps will be taken to provide all equipment necessary for employees to undertake their role.

Management will make arrangements to keep in regular contact with staff during a period of agile working and, specifically, to encourage them to come forward with any issues they may be having. Agile working may not work for everyone and the arrangement will be regularly reviewed and terminated if necessary.

Managers will work to agree with employees on how they will monitor their performance within the period of agile working. This may include setting of key targets, holding of regular meetings and ongoing performance reviews.

Managers will also work to ensure that any period of agile working does not interfere with the career development of employees, such as them missing out on key training opportunities. It is the responsibility of management to ensure all employees are provided fair opportunity in which to take part in these types of activity.

In assessing an employee's agile working preferences, the following will be discussed in consultation with the staff member.

- 3 key questions for staff / manager discussions:
  - Staff personal preferences / circumstances
  - Impact of agile working on the team and other colleagues
  - Output requirements and optimum working style of the job
- Staff and their managers should also consider the following:
  - "Phase In" approach regular review / evaluation
  - Ask for second opinion & management/HR support
  - Number of days in / out & communication tools to support this
  - Space / remote facilities / technology to support the employee
  - Flexibility around start / finish times fairness to all in the team
  - What adaptations can we / should we make
  - How can we support individuals and teams?
  - When do we review?
  - What if a staff member is unhappy with a decision or recommendation?
  - What are the staff members near and far worries / concerns?

## **Health and Safety Provisions**

MG ALBA will work to ensure that usual company health and safety provisions are adhered to in all locations involved in agile working. This will include conducting risk assessments of the agile working environments where necessary to comply with legal provisions, such as inspecting the home set-up.

If an employee's health condition or impairment is likely to be within scope of the Equality Act 2020, management will ensure that a risk assessment is undertaken to identify and implement any reasonable adjustments necessary that will assist them in carrying out their role.

# **Employee Responsibility**

Employees who are working remotely may not be as regularly observed by management, meaning that an element of trust will need to be maintained between all parties in order for the agile working arrangement to work.

Employees must ensure that they take rest breaks during the working shifts in line with MG ALBA's usual policies. This is to ensure their continued wellbeing and continued compliance with government Regulations. Again, if it is found that appropriate rest breaks are not being taken, the effectiveness of the agile working arrangement may be reviewed.

Employees working from home need to ensure a safe working environment that complies with the company's policies on health and safety. This includes adherence to Display Protective Equipment (DPE) standards. Full details can be found in these policies.

Employees who are working from other buildings separate to the usual workplace are expected to leave their workspace clean and tidy following use and remove all personal items. Standards of hygiene will be expected to be maintained throughout their period of working in this environment.

Agile workers need to remain fully contactable by management and colleagues, as they would be when office based, and must be prepared to undertake reasonable requests as directed.

Additionally, all confidential information relating to the company needs to be kept secure in line with its data protection policies. If it is found that the agile working arrangement has resulted, or has the potential to result in, a data breach, the arrangement may be terminated and those responsible could face disciplinary action.

#### **Flexible Working and Permanent Requests**

It is understood that agile working is to be permitted on a transitional basis subject to organisational review and does not represent a permanent change in working conditions. MG ALBA will therefore only consider such an arrangement within specific circumstances.

Employees who have at least 26 weeks of continuous employment have the statutory right to make a formal request for flexible working, which can involve changes to the usual place of work such as working from home permanently. In these situations, such a change would be considered permanent by both parties until a separate agreement is reached to change it further.

MG ALBA does not have to agree to such a request but will carefully consider it and provide sound business reasons should it be refused. Employees will be granted leave to appeal against this decision as soon as is reasonably practicable.

#### **Productivity**

It is the responsibility of employees to make sure any agile working arrangement does not impact upon their productivity and output. If it is found that this is the case, MG ALBA will review the effectiveness of the arrangement. Employees must also ensure that they comply with usual policies on absence and sickness.

#### **Home Expenses**

Currently you can claim tax relief for additional household expenses if you work from home on a regular basis either full time or part time.

You can claim tax relief for gas/electricity/metered water/business phone calls/internet but you can only claim a part of the bill that relates to your work and not the whole bill.

HMRC guidance expressly states that you cannot claim tax relief if you choose to work from home (if you have a base office location available to you).

#### Insurance

MG ALBA employer's liability insurance covers employers working from home.

Staff who are working from home must declare this to their own home insurance company to ensure it doesn't impact any resulting claim (for which MG would not accept liability).

#### **Travel Expenses**

Travel expenses can only be claimed for travel from work. Employees are not able to claim for travelling to and from work, unless the employee is travelling to a temporary place of work.

Staff working under agile working practices will have a base location of either Stornoway or Glasgow offices and would not be eligible to claim travel expenses from their home to their designated office location.

Staff who are designated home workers, whose contractual base location is their home address, are eligible to claim travel expenses.

Further guidance can be accessed via HMRC:

 $\underline{https://www.gov.uk/tax-relief-for-employees/travel-and-overnight-expenses}$ 

## 5.9 Stress Management Policy

#### Introduction

The health, safety and welfare of our employees is important to MG ALBA and we are committed to ensuring this is met. We are committed to identifying and reducing the causes of workplace stress, as we acknowledge that this is an important health and safety issue, and one that affects the personal wellbeing of our staff.

This policy is applicable to all employees. It is the line manager's responsibility to implement the policy, and it is MG ALBA's responsibility to provide the necessary resources.

#### **Definition of Stress**

Stress is defined by the Health and Safety Executive as "the adverse reaction people have to excessive pressure or other types of demand placed on them". There is a distinct difference between stress and pressure, as if managed correctly pressure can have a positive effect on an employee, whereas stress can be seen as detrimental to their well-being.

The effects of long-term stress can be seen in physical, intellectual, emotional and behavioural signs. These can include headaches, nausea, tiredness, palpitations, worrying, making mistakes, anger, irritability and job dissatisfaction.

MG ALBA will aim to identify all workplace stressors and risk assessments can be conducted to identify the risks and eradicate them, reviewing these regularly. When making proposals to prevent workplace stress the Investors in People Working Group will be consulted with. Training will be provided for all line managers in dealing with workplace stress, implementing MG ALBA's stress management policy and identifying any warning signs. Furthermore, occupational health support and counselling services for staff affected by workplace, or external, stress will be sourced by MG ALBA.

## **Responsibilities - Managers**

The responsibilities of managers are to:

- implement recommendations developed from the risk assessments within their teams
- ensure clear communication between management and staff, specifically on organisational changes that may affect them personally
- ensure there are developmental opportunities available to all staff
- monitor staff working hours to ensure they are not being overworked
- manage holidays to ensure staff are taking their full entitlement
- ensure that there is a zero tolerance on bullying and harassment
- offer additional support to members of staff who are experiencing stress outside work such as bereavement or separation.

## **Responsibilities - Health and Safety Adviser**

The responsibilities of the Health & Safety Adviser are to:

- provide stress management and risk assessment training for all managers
- consult with the HR Adviser when dealing with specific cases

# Responsibilities - HR Adviser

The responsibilities of the HR Adviser are to:

- continually review the effectiveness of MG ALBA's policy of reducing stress, in consultation with the Investors in People Working Group.
- provide guidance on the stress management policy to managers
- compile sickness absence statistics to measure the effectiveness of MG ALBA's stress management policy
- provide ongoing support to staff and management
- to encourage referrals to occupational health support services and counsellors if appropriate.

## **Responsibilities - Employees**

The responsibilities of employees are to:

- raise any issues relating to workplace stress to the Health & Safety Committee, their line manager or the HR Adviser
- undertake counselling or occupational support that is offered, when applicable

# Function of the Health & Safety and the Investors in People Working Groups

The function of representatives of the Health & Safety and Investors in People Working Groups who have responsibility for safety is to:

- Be consulted on any potential contributing factors to stress such as changes to work practices or design
- Be involved in the risk assessment and workplace surveys process
- Be allowed to access any relevant anonymous data from the HR Adviser
- Monitor the policy to ensure it is combatting the effects of stress and promoting employee wellbeing
- Report to the Senior Management Team at agreed intervals

## 5.10 Mental Health at Work Policy

Mental health problems are believed to be experienced by one in four adults, with mental health concerns being the second most prevalent reason for employee absence. This policy uses the term 'mental health problem' to include signs of stress and anxiety and mental health conditions that have been diagnosed by a medical professional, such as depression or PTSD.

MG ALBA understands the positive impact that healthy and engaged employees make to the success of the business. As such, MG ALBA pledges to provide initial and ongoing support and help for employees going through mental health problems. The purpose of this policy is to assist with creating an open and honest workplace where line managers and employees can discuss mental health problems, and to ensure the necessary support is known and offered to employees when needed.

#### **Legal Obligations**

MG ALBA understands the role it has in ensuring that health and safety legislation is adhered to. MG ALBA undertakes to create a safe workplace where risks to mental health and wellbeing are limited as far as possible. Additionally, MG ALBA understands the protection employees with a disability have against discrimination under the Equality Act 2010, including the obligation for employers to introduce reasonable adjustments for disabled employees.

#### Recruitment

Unless it is related to the specific requirements of the job, MG ALBA will not ask applicants at any stage of the recruitment process for information regarding any previous health issues, in order to ensure potential employees are not discriminated against because of their mental health history.

#### **Indicators**

To prevent mental health problems escalating, early intervention is important. In many cases, obvious indications that an employee is suffering from a mental health problem may not be present, however, early signs can include:

- behavioural, mood or temperament changes, especially when communication with others
- decrease in productivity and focus
- inability to make decisions and problem solving
- showing signs of tiredness or being withdrawn and unable to take part in hobbies they usually participate in
- reducing intake of food or increasing intake of alcohol, cigarettes etc.

## **Line Manager Responsibilities**

When dealing with an employee with mental health concerns, line managers should be open, welcoming and friendly. They should invite the employee to regular private meetings and ask them to talk openly about their mental health problems. The line manager should not make presumptions about how the mental health problem is impacting on the employee personally and professionally. Initial action should be to check how the employee is getting on at work, in the same manner as if the employee was suffering from a known physical health problem.

#### **Employee Responsibilities**

Any support required by the employee is likely to be known by the employee themselves. MG ALBA actively encourages employees to be open and honest about their mental health and to inform their line manager of any issues at an early opportunity to allow these to be addressed. There is also an expectation on all employees to conduct themselves in a helpful and open-minded manner towards colleagues who have mental health problems.

## **Action Planning**

With support from the HR Advisor, where a line manager identifies a mental health issue, they should work alongside the employee to create a personal wellness action plan that provides for proactive management of their mental health. This will support ongoing open communication between line managers and employees and will result in mutually agreed steps being set in place that can be monitored on an ongoing basis.

A wellness action plan should cover:

- actions and measures that can support the employee's mental health
- symptoms and triggers for poor mental health
- the impact mental health problems have, or could have, on the employee's performances
- any workplace supported required from their line manager or colleagues
- any positive actions the employee can take when suffering from poor mental health
- a review process to ensure the workplace support is having the required effect.

To ensure the plan meets the employee's requirements, it should be drafted by the employee themselves, with medical support as necessary, and then set in place with their line manager and the HR Advisor. Any information in the plan, and the plan itself, should be kept confidential and reviewed on an ongoing basis by the employee, the HR Advisor and their line manager.

#### **Workplace Adjustments**

A disability is defined as "a mental or physical impairment that has a substantial long-term effect on normal day-to-day activities". MG ALBA is legally obliged to make reasonable adjustments to an employee's role or workplace if they have a disability that places them at a disadvantage when performing their role. MG ALBA will endeavour to consider all reasonable workplace adjustments for any employee who is suffering from a mental health issue.

Examples of adjustments include:

- adjusting hours of work or the location of work, including within the building itself
- adjusting or reallocating duties of the job role
- making amendments to the workplace environment, for example adjusting lighting in the employee's office
- amending absence triggers before disciplinary action is triggered.

Once the adjustments are agreed, they will be reviewed on an ongoing basis to ensure they are having the required effect.

#### **Managing Absence and Return to Work**

Where the employee is absent by reason of their mental health concerns, their line manager will communicate with the employee on a regular basis during their absence. The employee returning to work may help with their recovery, so early intervention and support from MG ALBA is important. MG ALBA's sickness absence policy will apply to the employee's absence as normal, subject to any reasonable adjustments in place for the employee.

Upon the employee's return from absence, a return-to-work plan will be discussed and agreed between the line manager and the employee to ensure necessary steps can be taken to support the employee to remain in work. This can include introducing a temporary return on amended working hours, removing stressful duties during a phased return, and providing additional workplace support as necessary.

## Confidentiality

Information concerning an employee's mental health is classed as a special category of personal data. This information will only be disclosed to others in line with the MG ALBA's Privacy Notice, contact Catriona Neally for full policy details.

#### Training

Formal training on managing mental health in the workplace will be provided to all line managers and appointment Mental Health First Aid personnel.

# 5.11 Drug and Alcohol Policy

MG ALBA recognises that alcohol and drug abuse/dependency related problems are an area of health and social concern. It also recognises that employees with such problems need help and support from their employer.

MG ALBA also recognises that alcohol and drug abuse/dependency problems can have a detrimental effect on work performance and behaviour. MG ALBA has a responsibility to its employees and customers to ensure that this risk is minimised.

Accordingly, MG ALBA's policy involves two approaches:

- Providing reasonable assistance to you if you have an alcohol or drug abuse/dependency problem, providing you are willing to co-operate in treatment for that problem.
- Disciplinary rules, enforced through disciplinary procedures, where use of alcohol or drugs (other than on prescription) affects performance or behaviour at work, and where either (1) an alcohol or drug abuse/dependency problem does not exist or (2) where treatment is not possible, has not succeeded or you refuse to co-operate in obtaining treatment.

MG ALBA does not have the internal resources to provide or arrange treatment or other forms of specialist assistance. Such services are provided by GPs, hospitals and other specialist agencies. Through this policy, MG ALBA will seek both to assist you in obtaining such specialist help and to protect your employment.

MG ALBA will, where possible, provide the following assistance to employees:

- Helping you to recognise the nature of the problem, through referral to a qualified diagnostic or counselling service.
- Support you during a period of treatment. This may include a period of sick leave or approved other leave (which
  may be unpaid), continuation in post or transfer to other work, depending upon what is appropriate in terms of
  your condition and the needs of MG ALBA.
- The opportunity to remain or return to work following the completion of a course of treatment, as far as is practicable, in either your own post or an alternative post.

MG ALBA assistance will depend upon the following conditions being met:

- The Occupational Health Service/ MG ALBA Approved Doctor diagnoses an alcohol or drug abuse/dependency related problem.
- You recognise that you are suffering from an alcohol or drug abuse/dependency problem and are prepared to co-operate fully in referral and treatment from appropriate sources.

MG ALBA and its employees must recognise the following limits to the assistance that can be provided:

- Where you fail to co-operate in referral or treatment arrangements, no special assistance will be given and any failure or deterioration in work performance and behaviour will be dealt with through the Disciplinary Procedure.
- If the process of referral and treatment is completed but is not successful and failure or deterioration in work performance or behaviour occurs, these will be dealt with through the Disciplinary Procedure.
- Your continuation in your post or an alternative post during or after treatment will depend upon the needs of MG ALBA at that time.

In line with MG ALBA's disciplinary rules, the following will be regarded as serious misconduct:

- Attending work and/or carrying out duties under the influence of alcohol or drugs.
- Consumption of alcohol or drugs whilst on duty (other than where prescribed or approval has been given).

Breach of these rules will normally result in summary dismissal and only in exceptional cases will either notice or the reduced disciplinary action of a final written warning be applied.

Where a breach of these rules occurs, but it is established that an alcohol or drug abuse/dependency related problem exists, and you are willing to co-operate in referral to an appropriate service and subsequent treatment, MG ALBA will suspend application of the Disciplinary Procedure and provide assistance as described above.

If you do not comply with the treatment suggested or continue to abuse alcohol or drugs, you will be subject to the application of the Disciplinary Policy.

Alcohol or drug abuse/dependency related problems can come to the notice of management through:

- Failures or deterioration in work performance or behaviour necessitating use of the Disciplinary Procedure. In such situations the procedure described above should be followed.
- Other means, where an employee seeks or agrees to accept assistance on a voluntary basis.

Abuse of alcohol or drugs can affect performance and behaviour at work, i.e., either through serious misconduct at work, (where there is a direct and demonstrable breach of the disciplinary rules regarding alcohol or drug abuse at work) or where there is a falling off of standards of work performance or behaviour and abuse of alcohol or drugs is a possible cause.

Your immediate Line Manager will be responsible for responding to such situations and carrying out either counselling or disciplinary investigations and interviews, supported as appropriate by a more senior Manager.

In such interviews the possible existence of an alcohol or drug abuse/dependency problem should be explored. The line manager is not required to diagnose the existence of an alcohol or drug abuse/dependency problem, merely to assess whether such abuse is a possible factor.

Any requirements of the Disciplinary Procedure regarding third party representation will be observed.

Should the interviews lead to the conclusion that an alcohol or drug abuse/dependency problem might exist, and you accept referral, the Manager should refer the matter to the Occupational Health/MG ALBA Approved Doctor, who will be responsible for establishing whether or not a diagnosis of alcoholism or drug dependence can be made. Disciplinary action should be suspended until diagnostic advice is obtained. Where appropriate, suspension arrangements in the Disciplinary Procedure should be followed.

If the interview fails to lead to the conclusion that an alcohol or drug abuse/dependency problem exists, or you reject, or fail to co-operate in a referral, disciplinary action should be continued, where and as the situation justifies.

#### 5.12 Wellbeing at Work Policy

### **Purpose**

MG ALBA supports a structured approach to wellbeing in ensuring our people can engage with the strategic work of the business, transition into agile working patterns, live and work within a supported healthy work-life balance environment and engage with their chosen path of personal development. Our Wellbeing at Work Policy details the aims and outputs of this policy.

This policy applies to all employees, Board members, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns.

#### Aims

MG ALBA commits to providing a healthy working environment that supports:

- Preventative health and wellbeing practices and behaviours as part of the workplace culture
- A preventative health environment which will support a resilient, motivated and productive workforce
- Re-enforcing that our people are our most important assets, and we value our ability to provide and foster a safe and healthy workplace and culture

#### **Benefits**

MG ALBA are committed to investment in wellbeing in our working practices, recognising that wellbeing at work can

- Reduce absenteeism
- Reduce presenteeism & leave-ism
- Increase productivity
- Increase employee retention
- Contribute to our brand & community value

### **Promise**

- To sustain our business, whilst meeting personal individual and team needs
- To be an inclusive employer of choice
- To put our people first
- To destigmatise difficult conversations and support people to grow and develop in dealing with difficult issues
- To ensure our workplace is a 'good place to be'!

#### **Format**

Working in consultation with the Investors in People "We Invest in Wellbeing" framework, MG ALBA will:

- Consult with staff and line managers on having confidential, 1-1 wellbeing check in conversations
- Include wellbeing on the agenda at management/health & safety/risk group meetings
- Include wellbeing as part of the annual appraisal process
- Survey staff regularly on wellbeing at work
- Consult with the Investors in People, Corporate Risk and Business Continuity Working Groups in matters relating to wellbeing at work
- Provide ongoing support and training to staff and management
- Encourage referrals to occupational health support services and counsellors if appropriate

#### Responsibilities

MG ALBA have a legal obligation and duty of care to provide a safe workplace where wellbeing is approached from a pro-active perspective and risks to health and wellbeing are identified and mitigated as far as possible. MG ALBA have a legal duty to take reasonable care to ensure that health is not put at risk by excessive pressures or demands arising from the way work is organised. As individuals, we also are all responsible for wellbeing and the way that we do that is through guidance, observation, support, coaching and reporting in a safe and trusted manner. It's important to recognise that we all have unique life circumstances and situations, and that life and work events are processed differently. Our culture is one of safety and wellness and we should always look out for each other, notice any changes, and recognise when people may need help or support. Specific guidance is provided within this policy.

This policy takes account of MG ALBA's obligations under the Health and Safety at Work etc Act 1974, Management of Health and Safety at Work Regulations 1999, Employment Rights Act 1996, Protection from Harassment Act 1997, Working Time Regulations 1998 and Equality Act 2010.

#### **Wellbeing Procedures**

#### **Mental Health at Work**

Mental health problems are believed to be experienced by one in four adults, with mental health concerns being the second most prevalent reason for employee absence. This policy uses the term 'mental health problem' to include signs of stress and anxiety and mental health conditions that have been diagnosed by a medical professional, such as depression or PTSD.

MG ALBA understands the positive impact that healthy and engaged employees make to the success of the business. As such, MG ALBA pledges to provide initial and ongoing support and help for employees going through mental health problems. The purpose of this policy is to assist with creating an open and honest workplace where line managers and employees can discuss mental health problems, and to ensure the necessary support is known and offered to employees when needed.

### **Legal Obligations**

MG ALBA understands the role it has in ensuring that health and safety legislation is adhered to. MG ALBA undertakes to create a safe workplace where risks to mental health and wellbeing are limited as far as possible. Additionally, MG ALBA understands the protection employees with a disability have against discrimination under the Equality Act 2010, including the obligation for employers to introduce reasonable adjustments for disabled employees.

#### Recruitment

Unless it is related to the specific requirements of the job, MG ALBA will not ask applicants at any stage of the recruitment process for information regarding any previous health issues, in order to ensure potential employees are not discriminated against because of their mental health history.

#### **Indicators**

To prevent mental health problems escalating, early intervention is important. In many cases, obvious indications that an employee is suffering from a mental health problem may not be present, however, early signs can include:

- behavioural, mood or temperament changes, especially when communication with others
- decrease in productivity and focus
- inability to make decisions and problem solving
- showing signs of tiredness or being withdrawn and unable to take part in hobbies they usually participate in
- reducing intake of food or increasing intake of alcohol, cigarettes etc.

### **Line Manager Responsibilities**

When dealing with an employee with mental health concerns, line managers should be open, welcoming and friendly. They should invite the employee to regular private meetings and ask them to talk openly about their mental health problems. The line manager should not make presumptions about how the mental health problem is impacting on the employee personally and professionally. Initial action should be to check how the employee is getting on at work, in the same manner as if the employee was suffering from a known physical health problem.

#### **Employee Responsibilities**

Any support required by the employee is likely to be known by the employee themselves. MG ALBA actively encourages employees to be open and honest about their mental health and to inform their line manager of

any issues at an early opportunity to allow these to be addressed. There is also an expectation on all employees to conduct themselves in a helpful and open-minded manner towards colleagues who have mental health problems.

#### **Action Planning**

With support from the HR Advisor, where a line manager identifies a mental health issue, they should work alongside the employee to create a personal wellness action plan that provides for proactive management of their mental health. This will support ongoing open communication between line managers and employees and will result in mutually agreed steps being set in place that can be monitored on an ongoing basis.

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- symptoms and triggers for poor mental health
- the impact mental health problems have, or could have, on the employee's performances
- any workplace supported required from their line manager or colleagues
- any positive actions the employee can take when suffering from poor mental health
- a review process to ensure the workplace support is having the required effect.

To ensure the plan meets the employee's requirements, it should be drafted by the employee themselves, with medical support as necessary, and then set in place with their line manager and the HR Advisor. Any information in the plan, and the plan itself, should be kept confidential and reviewed on an ongoing basis by the employee, the HR Advisor and their line manager.

### **Workplace Adjustments**

A disability is defined as "a mental or physical impairment that has a substantial long-term effect on normal day-to-day activities". MG ALBA is legally obliged to make reasonable adjustments to an employee's role or workplace if they have a disability that places them at a disadvantage when performing their role. MG ALBA will endeavour to consider all reasonable workplace adjustments for any employee who is suffering from a mental health issue.

Examples of adjustments include:

- adjusting hours of work or the location of work, including within the building itself
- adjusting or reallocating duties of the job role
- making amendments to the workplace environment, for example adjusting lighting in the employee's office
- amending absence triggers before disciplinary action is triggered.

Once the adjustments are agreed, they will be reviewed on an ongoing basis to ensure they are having the required effect.

### **Managing Absence and Return to Work**

Where the employee is absent by reason of their mental health concerns, their line manager will communicate with the employee on a regular basis during their absence. The employee returning to work may help with their recovery, so early intervention and support from MG ALBA is important. MG ALBA's sickness absence policy will apply to the employee's absence as normal, subject to any reasonable adjustments in place for the employee.

Upon the employee's return from absence, a return-to-work plan will be discussed and agreed between the line manager and the employee to ensure necessary steps can be taken to support the employee to remain in work. This can include introducing a temporary return on amended working hours, removing stressful duties during a phased return, and providing additional workplace support as necessary.

# Confidentiality

Information concerning an employee's mental health is classed as a special category of personal data. This information will only be disclosed to others in line with the MG ALBA's Privacy Notice, contact Catriona Neally for full policy details.

### **Training**

Formal training on managing mental health in the workplace will be provided to all line managers and appointed Mental Health First Aid personnel.

### **Wellbeing Checklist**

Without a healthy mind, body, accomplishing your daily work goals can be difficult. If you work from home, you know that sometimes you can experience loneliness, isolation, and the inability to switch your mind off. Regardless of where you are working from, it is imperative to take care of yourself and your wellbeing. Below is a checklist of suggestions to help you take care of your own wellbeing, regardless of where you are working from.

#### Create a schedule and stick to your routine

- Schedule short breaks throughout the day.
- Include fun activities for the day in your break schedule.

### Stay physically active and healthy

- Engage with exercise you enjoy, this helps lower anxiety.
- Encourage your co-workers to work out together if appropriate.
- Stay hydrated, make sure you drink sufficient water.
- Take a few minutes to stretch reguarly.

### Get creative; stimulate your mind

- Engage in arts or crafts activities that interest you.
- Listen to music that calms you.
- Listen to a podcast.
- Read or listen to audio books.

### Meditate and disconnect

- Disconnect from social media unless it is necessary to complete your job.
- Take a few deep breaths; breath in and out.
- Read a few pages of a book of your choice.
- Pray or meditate in silence.
- Light a scented candle, burn incense or use an essential oil diffuser.

### Find your support system

- Schedule video calls with colleagues, friends, and family so that you are getting that social time.
- Speak to your manager if you are feeling overwhelmed by the amount of work.
- Seek regular professional help; speak to a therapist, psychologist, pastor etc.

#### Wellbeing Guidance - Burnout - Is this You?

Burnout is a state of physical and emotional exhaustion. It can occur when you experience long-term pressure in your job, or when you have worked in a physically or emotionally draining role for a long time.

### Common signs of burnout:

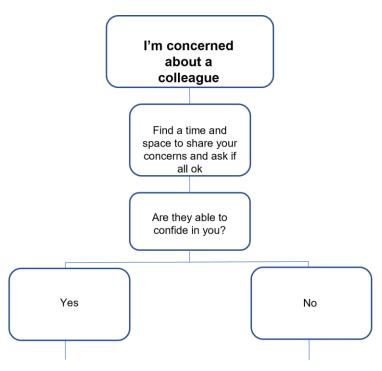
- Feeling tired or drained most of the time
- Feeling helpless, trapped and/or defeated
- Feeling detached/alone in the world
- Having a cynical/negative outlook
- Self-doubt
- Procrastinating and taking longer to get things done
- Feeling overwhelmed
- Excessive drive/ambition/pushing yourself to work harder
- Neglecting your own needs
- Displacement of conflict (blame culture)
- No time for nonwork-related needs (withdrawing, loss of interest).
- Denial (impatience mounts, see faults in others)
- Isolation (social invitations are now a burden)
- Behavioral changes (irritability, upset, silence)
- Depersonalization (feeling detached from your life and control of it)
- Inner emptiness or anxiety (turning to other substances or activities)
- Depression
- Mental or physical collapse

It's important to recognise that individuals may experience one or several of these signs, and they may not be occurring at the same time. Burnout is not something that tends to go away or resolve itself. It is important to address the underlying issues causing it.

You should also refer to the Stress Policy and stress risk assessments as a mechanism for seeking help and support through your line manager, the HR advisor or occupational health.

### Wellbeing Guidance – Burnout – Are you worried for a colleague?

In our working lives it's often the case that we may first notice signs in the people that we work closely or regularly with. Our culture of safety and wellness means that we encourage everyone to look out for each other and notice any changes. It can often be a confidential conversation with a trusted colleague that will help someone take the next step to seek help. It's important to reassure anyone in this position through active listening and if you are comfortable, to "ask again" if you believe someone is needing further support. Support is available from managers and to managers as detailed on the next page.



- Happy to share what's going on confidentially remember their right to privacy Seek further support:
- - Line Manager
  - HR Advisor
  - Mental Health First Aiders
  - GP
  - Occupational Health
- External support services
  Keep in dialogue but know when you need to signpost to seek further support (if not immediately)
- Agree check ins

- Not comfortable in speaking Not ready to speak
- No issues to address
- Remember rights to confidentiality and privacy

#### 6.1 POLICY REVIEW

The MG ALBA Health and Safety Policy will be kept up to date, particularly as the business changes in nature and size. To ensure this, the policy and the way in which it has implemented will be reviewed on an annual basis. In addition, reviews of risk, COSHH and Fire Risk Assessments etc will take place from time to time and in line with current legislation.

MG ALBA is committed to providing the highest standard of Health and Safety and re-affirms this by maintaining and reviewing its policy, procedures and training.

#### 7.0 APPENDICES

## 7.1 General Safety Rules

The following set of safety rules will form part of each staff member's induction process and are deliberately set in summary format to ensure clarity from the beginning. The rules have the full backing from the Board of Members. Failure to comply with these rules will lead to disciplinary action. It is the intention of these rules to provide safe and healthy working

environment.

An awareness of safety only comes from practising the fundamental rules; avoiding unnecessary risks and showing courtesy and consideration at all times. Don't let familiarity make you contemptuous of danger.

### **Generic Rules**

- Work areas to be kept clean and tidy and clear of tripping hazards.
- Stairs and passageways to be kept clear.
- Check ladders, steps and other access equipment for defects before use. If damaged do not use and report to your line manager.
- Electrical equipment should be switched off and unplugged when left unattended unless designed to be left plugged in.
- Report all mechanical and electrical defects to the Office Manager who will enable repairs.
- Use the lift, sack trucks or trolleys etc to prevent manual handling injuries.
- Use correct lifting technique when handling goods. Ask for help if the load is heavy.
- · Observe the manual handling controls displayed, particularly for prop weights and water bottles
- Use personal protective equipment if necessary, even for brief periods. Especially beware of heavy prop weights which could injure your feet.
- Report all accidents, dangerous occurrences and near misses.
- Horseplay may endanger staff and is prohibited.
- Every employee is expected to report any problems or safety concerns to your line manager. The manager has a duty to give proper attention to these.
- It is company policy to provide safety equipment & PPE where required. If you find yourself in a situation where PPE is required and has not been provided, please bring this to your managers attention.
- Site speed limit is 5mph in the car park.

#### **Fire Precaution Rules**

- Fire exits are to be kept clear.
- All employees to be aware of fire safety procedures.
- Never assume that a fire alarm is false.
- Never leave internal fire doors propped or wedged open
- Smoking is only permitted outside the building.
- Rubbish is a high fire risk and should not be allowed to accumulate.
- Take due care and attention when dealing with flammable liquids and substances.

#### Office Rules

- Allow space for access to desks, shelves etc.
- Only open one drawer at a time of a filing cabinet otherwise there is a risk of it falling over.
- Do not overload shelves.
- Do not place items on top of cabinets where they could fall.
- Use steps or step ladders not chairs to gain access to high levels.
- Display screen equipment is continuously assessed. Results to be taken into account by the user.
- Do not sit on suspended work surfaces.

### <u>Studio</u>

- Do not use work at height equipment unless trained and authorised.
- Keep all flammable substances in flammable stores provided
- Ensure that all ladders are inspected before use, are only used for short duration and where absolutely necessary, and that they are stored in a safe manner when not required
- Ensure that the studio risk assessments are available to all visitors and staff
- Ensure that an MG ALBA staff member is available at all times while the studio is in use

### 7.2 Visitor Induction Checklist

Visitors Name:	Date of Induction:
Employer (if applicable):	
Person conducting induction:	

#### Information

Introduction – all short term, casual and first-time visitors to the premises are required to read and understand the following **Information** and **Requirements** on their first visit to the premises.

Visitors must sign the Visitor's Book both on arrival and departure from the building.

Testing of the Fire Alarm system takes place on Wednesdays at around 1130am. At any other time on hearing the Fire Alarm (A high pitched tone) you should leave the building by the nearest available exit and make your way to the Evacuation Assembly Point in the car park to the rear of the building. Should you be the person to discover a fire you should first of all raise the alarm by shouting 'FIRE' and activating one of the break glass points located at final and storey exits.

Welfare - toilet facilities are available as follows

Ground Floor 54 Accessible (next to the lift)
Ground Floor 54 (Next to shared Dressing Areas)

First Floor 54 (Next to the lift)
First Floor 54 (Next to the kitchen)
Ground Floor 56 (Next to the Boardroom)
First Floor 56 (In the open plan area)

Kitchen facilities -

Green Room 54 First Floor 54

Ground Floor 56 (end of the corridor by the Boardroom)

First aid – first aid boxes are located at Reception and all the kitchen areas

The First Aiders, contacted through reception, are

Colin Murray Marina MacDonald Graham Morrison Amy MacAulay Fiona Mackenzie Laura Hegarty

### Requirements

Vehicles – all vehicles should be parked in the car park to the rear of the building. Parking at the front of the building is only for very short pick-up or drop-off.

Electrical equipment – any electrical equipment brought on site should be in good working order and/or show evidence of 'PAT testing'.

Areas out of bounds – the following areas are out of bounds to all visitors unless a Permit to Work has been issued – gas store, UPS and electricity meter room, switch room, first floor plant room, Apps Room

Areas requiring escort - the following areas require visitors to be accompanied at all times – studio and production areas and all office spaces. To avoid any difficulties, visitors are expected to comply with this requirement and not to put pressure on existing staff.

#### Site security arrangements

- External door entry is by fob only or by door release switches operated by the Receptionist.
   Reception will be covered from 9am until 5.30pm Mon Thurs and 5pm on Fri.
   The building is locked each night at 5.30pm Mon Thurs and 5pm on Fri.
   Access outwith working hours can be arranged but must be approved by the Office Manager.
- Entrance for visitors is via the front and back door @ 54.
- All internal doors are secure and can only be accessed via fob or personal pin number.
- Under no circumstances are you to leave any packages or containers unattended unless they have been cleared by a permanent member of staff. Any such items left unattended may be removed off the premises and destroyed.

Any person found to be in contravention of any of the above **Requirements** may be asked to leave the premises.

confirm that I have read and understood the above <b>In</b>	formation and Requireme
Signature of Visitor	Dated
Name and Signature of Witness	Dated

# **7.3** Permit to Work

Permit			1	Issued I	by						
Number											
Contractor											
(and/or)	1										
MG ALBA Staff											
Location of											
Work											
Scope of the											
Work											
Valid from	Time						Date				
Valid to	Time						Date				
\A(				•	1-4 1 / 1-	-1	CC				
Where required						СКЕ	ea ott	C:			Data
Floorinity.	Yes/No	Point c	of isolation	1	Name			Signat	ture	;	Date
Electricity											
Gas											
Water											
Fire alarm											
Other											
Other precautic (e.g. public safe lone working et	ty, traffic mo	vement,									
Tools & Equipm	ent										
(e.g. scaffold, w	elding equipr	ment,									
110v tools, exti	nguishers etc	.)									
V PPE as appropr	iate										
Head	Foot	Hand		Eye		H	Hearing		-	ratory	Fall arrest/
protection	protection	prote	ction	prote	ction	p	rotection	pr	ote	ction	work restraint
_											
Before work sta				-				_	low	by both the	e Client
Authorising Per	son and the C	Contractor	Site Super	rvisor b	efore wo	ork (	commence	es			
Time		1									
Contractor Site		Name:			Sign					Date:	
Client Authorisi	ng Person	Name:			Sign	atu	re:			Date:	
· -											
On completion						s re	instated, a	II perso	ns h	nave been w	ithdrawn as
appropriate and	the area has	been left	ın a sate c	conditio	on						
Time		T									
Contractor Site	•	Name:			Sign					Date:	
Client Authorisi	ng Person	Name:			Sign	atu	re:			Date:	

#### **Permit to Work Notes**

#### The following notes should be read prior to the issue of a Permit to Work and used as a form of Aide-Memoire

Permit-to-Work systems should not be applied to all activities, as experience has shown that their overall effectiveness may be weakened. Permits-to-Work are not normally required for controlling general visits to site or routine maintenance tasks in non-hazardous areas.

A permit-to-work system is an integral part of a safe system of work and can help to safely manage the wide range of activities which can take place close together in a small space

When incidents do occur, human factors, such as failure to implement procedures properly, are often a cause. These failures may be for reasons of a lack of training, instruction, communication or understanding of either the purpose or practical application of permit-to-work systems.

The permit-to-work system should ensure that authorised and competent people have thought about foreseeable risks and that those risks are avoided by putting suitable precautions in place.

#### The objectives and functions of such a system can be summarised as:

- ensuring the designated work has proper authorisation;
- making clear to people carrying out the work the exact location, nature and extent of the job and the hazards involved;
- any limitations on the extent of the work and any specific time during which the job may be carried out;
- specifying the precautions to be taken, including safe isolation from such as hazardous substances, electricity, gas and any other potential risks;
- ensuring that the person in direct charge of the area, plant or installation is aware of all hazardous work being done under the permit;
- providing a record showing that the nature of the work and the precautions required have been checked by an appropriate person or people;
- providing for the suitable display of copy permits on lock-outs or isolation switches;
- providing a procedure to manage times when work has to be suspended, ie stopped for a period before it is complete;
- providing for the overall control of work activities that may interact or affect one another;
- providing a formal handover procedure for use when a permit is issued for a period longer than one shift;
- providing a formal hand-back procedure to ensure that the area, plant or installation affected by the work is in a safe condition;

### 7.4 Environmental Policy Statement

In all of its business activities, MG ALBA is committed to following an environmental policy which, whilst allowing the company to deliver its services in an efficient and commercially aware manner, recognises the need for responsible stewardship of our living environment. Our overall objective is to carry out our operations in a way that manages and minimises any adverse environmental impact.

#### We aim to:

- Reduce Energy consumption and increase the efficiency with which we use Energy.
- Maximise the efficiency with which we use material and other resources.
- Actively reduce waste through responsible disposal, reuse and recycling of materials.
- Comply with all relevant legislation and challenge us to achieve best practice.
- To improve the environmental awareness and skills of our employees.
- Encourage other contractors and suppliers to adopt our environmental policies.
- Implement an Environmental Management System with objectives and targets.
- Set and review of Environmental objectives and targets.

MG ALBA's's Environmental Policy, and the measures to implement it, have been devised on the basis of guidance from the relevant bodies as well as in consultation with the employees.

A responsible attitude to the environment is the responsibility of everyone and all management and staff are expected to contribute to achieving the company's overall objective. MG ALBA will provide adequate and appropriate resources to implement this policy and will ensure it is properly communicated and understood.

The aim of the company is to encourage initiative and adopt best practice in a culture where all involved are aware of their individual responsibilities for the environment and actively engaged and committed to improving standards of environmental management.

The Environmental Policy is the responsibility of the Office Manager.

Statutory Duty Holder:	Donald Campbell
Responsible Person:	Marina Macdonald
Authorised Deputy:	Graham Morrison
Maintenance Provider:	Lewis Builders

### System Flushing Register - No. 54

Identify any little-used outlets, including showers, (typically unused for one week or longer)

Little-used outlets should be flushed for approximately 2 minutes per week to reduce risks of water stagnating

Room	Outlets	Flush (Y-N/A)	Date and Sign Below (Weekly)
Disabled Toilet (Upstairs)	1x Hot - 1x Cold	N/A	
Female Toilet 1 (Upstairs)	1x Hot - 1x Cold	N/A	
Female Toilet 2 (Upstairs)	1x Hot - 1x Cold	N/A	
Kitchen (Upstairs)	1x Hot - 1x Cold	N/A	
Cleaners Cupboard (Up)	1x Hot - 1x Cold	YES	
Disabled Toilet (Down)	1x Hot - 1x Cold	N/A	
Kitchen (Down)	1x Hot - 1x Cold	N/A	
Dressing Room 1	1x Hot - 1x Cold	YES	
Dressing Room 2	1x Hot - 1x Cold	YES	
Dressing Room Toilets (F)	2x Hot - 2x Cold	YES	
Dressing Room Toilets (M)	2x Hot - 2x Cold	YES	
Dressing Room Shower (M)	Mixer Unit	YES	
Dressing Room Shower (F)	Mixer Unit	YES	
Kitchen Ice-maker (Down)	1x Cold	YES	
Notes:		•	

# System Flushing Register - No. 54

Identify any little-used outlets, including showers, (typically unused for one week or longer)

Little-used outlets should be flushed for approximately 2 minutes per week to reduce risks of water stagnating

Room	Outlets	Flush (Y-N/A)	Date and Sign Below (Weekly)				
Disabled Toilet (Upstairs)	1x Hot - 1x Cold	N/A					
Female Toilet 1 (Upstairs)	1x Hot - 1x Cold	N/A					
Female Toilet 2 (Upstairs)	1x Hot - 1x Cold	N/A					
Kitchen (Upstairs)	1x Hot - 1x Cold	N/A					
Cleaners Cupboard (Up)	1x Hot - 1x Cold	YES					
Disabled Toilet (Down)	1x Hot - 1x Cold	N/A					
Kitchen (Down)	1x Hot - 1x Cold	N/A					
Dressing Room 1	1x Hot - 1x Cold	YES					
Dressing Room 2	1x Hot - 1x Cold	YES					
Dressing Room Toilets (F)	2x Hot - 2x Cold	YES					
Dressing Room Toilets (M)	2x Hot - 2x Cold	YES					
Dressing Room Shower (M)	Mixer Unit	YES					
Dressing Room Shower (F)	Mixer Unit	YES					
Kitchen Ice-maker (Down)	1x Cold	YES					

Notes:

# System Flushing Register - No. 56

Identify any little-used outlets, including showers, (typically unused for one week or longer)

Little-used outlets should be flushed for approximately 2 minutes per week to reduce risks of water stagnating

Room	Outlets	Flush (Y-N/A)	Date and Sign Below (Weekly)
Kitchen (Upstairs)	1x Hot - 1x Cold	N/A	
Female Toilet (Upstairs)	3x Hot - 3x Cold	YES	
Male Toilet (Upstairs)	3x Hot - 3x Cold	YES	
Disabled Toilet (Upstairs)	1x Hot - 1x Cold	YES	
Cleaners Cupboard (Up)	1x Hot - 1x Cold	YES	
Kitchen (Down)	1x Hot - 1x Cold	N/A	
Female Toilet (Down)	1x Hot - 1x Cold	N/A	
Male Toilet (Down)	1x Hot - 1x Cold	N/A	
Kitchen Ice-maker (Down)	1x Cold	YES	

# **Temperature Testing**

Identify sentinel outlets (i.e. sinks nearest and furthest cold and hot water sources) and monitor hot and cold water temperatures **Monthly**.

Cold water should be below 20°C after 2 minutes, Hot water should be above 50°C after 1 minute.

Sentinel Outlet	Tempera	ature ( °C )	Date/	e/ Temperature (°C)		Temperature (°C)		Date/	Temperature (°C)		Date/
Location	Hot	Cold	Sign	Hot	Cold	Sign	Hot	Cold	Sign		
Disabled Toilet (54-Up, Near)											
Female Toilet 2 (54-Up, Far)											
Male Toilets (56-Up, Near)											
Kitchen (56-Down, Far)											
Disabled Toilet (54-Down)											
Kitchen (54-Down)											
				•							

Notes:			

# **Shower Cubicles**

Ensure showers and showerheads are being cleaned and disinfected on at least a quarterly basis. Note - Showerheads may need to be included in the System Flushing Register.

Room	Outlets	Clean/Disinfe ct	Date (Quarterly)	Signed
Dressing Room Shower (M)	Mixer			
	Unit			
Dressing Room Shower (F)	Mixer			
	Unit			

Room	Outlets	Clean/Disinfe ct	Date (Quarterly)	Signed
Dressing Room Shower (M)	Mixer			
	Unit			
Dressing Room Shower (F)	Mixer			
	Unit			

Room	Outlets	Clean/Disinfe ct	Date (Quarterly)	Signed
Dressing Room Shower (M)	Mixer			
	Unit			
Dressing Room Shower (F)	Mixer			
	Unit			

Room	Outlets	Clean/Disinfe ct	Date (Quarterly)	Signed
Dressing Room Shower (M)	Mixer			
	Unit			
Dressing Room Shower (F)	Mixer			
	Unit			

# Ice-Maker

Although not included in the Legionella Risk Assessment, ice making equipment will be emptied and cleaned Quarterly.

Room	Equipment	Clean/Disinfect Quarterly - Date and Sign Below
Kitchen No.54	American Fridge	
Kitchen No.56	American Fridge	