

Title	Health & Safety Policy 2023
Process Owner	Belinda Brooke - Manager responsible for SHE
Date Updated	20/04/2023
Approved By	Senior Management
Summary	Policy aim is to ensure a safe working environment and to proactively prevent accidents and incidents and minimise its impact on the environment whilst maintaining legal compliance through the implementation of the Safety, Health and Environment Management System (SHEMS).
Classification	Public
Standard	SHE
Version	20.0

Change Record
Enter any changes to the document within the tag below...
V20 Reviewed – April 2023 Amended Manager responsible for SHE from Howard Marshall to Belinda Brooke

RULLION LIMITED

**(Comprising of Rullion Ltd and/or Rullion Build Ltd and/or Rullion Engineering Ltd
and/or Rullion IT Plus Ltd and/or Rullion Solutions Ltd)**

HEALTH & SAFETY - STATEMENT OF INTENT (19th Issue)

Integral to Rullion's aims is ensuring a safe working environment and to proactively prevent accidents and incidents and minimise its impact on the environment whilst maintaining legal compliance through the implementation of the Safety, Health and Environment Management System (SHEMS).

Avoidance of accidents and work-related ill health and the provision of a safe working environment requires the cooperation, involvement and ongoing integrated effort of the Board of Directors, Managers, Supervisors, Health and Safety Representatives and Staff at all levels

It is Rullion's intention to have a pro-active approach to safety, health, environment and welfare matters facilitating a firm commitment to continuous improvement. As such, we shall ensure that SHEMS is linked to our business quality systems and plays an integral part in the assessment of our overall performance.

Rullion is committed to promoting best practice in all areas of the business through a continuous process of hazard identification and control, risk assessment, strategic planning, training and development and a structured recruitment process. These arrangements are designed to help ensure that a suitable degree of competence is maintained at all levels and that the business is fully compliant with the requirements of current legislation and industry standards.

The Board of Directors takes direct responsibility for the promotion of best practice, the approval of policy and procedural documentation, and the provision of funding as appropriate and reasonable based on a clear assessment of risks and legal requirements. Managers and supervisory staff are responsible for the promotion of best practice and the integration of Health and Safety matters into all activities including the education, development and supervision of employees as appropriate.

Every employee is fully aware that they are responsible for promoting and actively practicing Rullion philosophy ensuring not only their own safety but also that of others including, but not limited to, the identification and reporting of any hazards, issues or concerns surrounding the workplace or role, and following guidance relating to environmental protection.

Rullion is an employment business and has arrangements in place for ensuring that liaison with its Clients is sufficient so as to clearly identify their requirements with regard to Health and Safety competence. These arrangements cover both employees and temporary workers alike.

The associated Policies and Management System will be reviewed on an annual basis to ensure that they continue to meet the needs of employees, the business and current legislation. Copies of Policies and the Management System can be accessed via the Intranet and this statement will be displayed in all offices.

DocuSigned by:

Belinda Brooke

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B Brooke

Manager Responsible for SHE

Revision Dated: April 2023 (previous revisions available on request)

1. Overview

This document contains the written element of Rullion Limited (Rullion) Health and Safety Management System. It details the corporate policy on Health and Safety issues and sets out the arrangements for managing these issues so that the Policy may be given full effect. Within the arrangements are the detailed measures to protect Rullion employees, the public and anyone that may be affected by Rullion activities, along with the environment.

The Health and Safety Management System encourages the development of a positive health and safety culture. For this system to be successful every director, manager, employee and operative of Rullion has a part to play in its effective implementation. It is essential that all staff read this document, understand its requirements relating to them and actively carry them out.

This document has been structured to the principles of HS(G)65, Successful Health and Safety Management, and is shown in the diagram 'Rullion Limited - Health and Safety Document Hierarchy'.

This Health and Safety Management System applies to all of Rullion activities and businesses. Some areas of Rullion operations have specific risks or legal obligations, for example, construction work or construction activities. These operations are managed in accordance with specific sections within this Health and Safety Management System. Any specific management systems fall under the overall umbrella of this document and are integrated within it.

The Health and Safety Management System and its sub-documents are prepared, updated issued by Rullion Manager responsible for SHE following authorisation by the Chief Executive Officer (CEO) and following consultation with the Board of Directors. Any comments or recommendations on the Health and Safety Management System should be forwarded to the CEO.

2 ORGANISATION

2.1 Group Overview

Rullion is one of the largest independent human resource providers in the UK, covering the nation from offices in the UK. Most Locations have between 5 and 20 employees on one site, with the exception of our registered office in Manchester.

Rullion is currently made up of a group of trading companies operating under Rullion Limited.

This Health and Safety Management System applies to the following trading companies which comprise Rullion Limited:

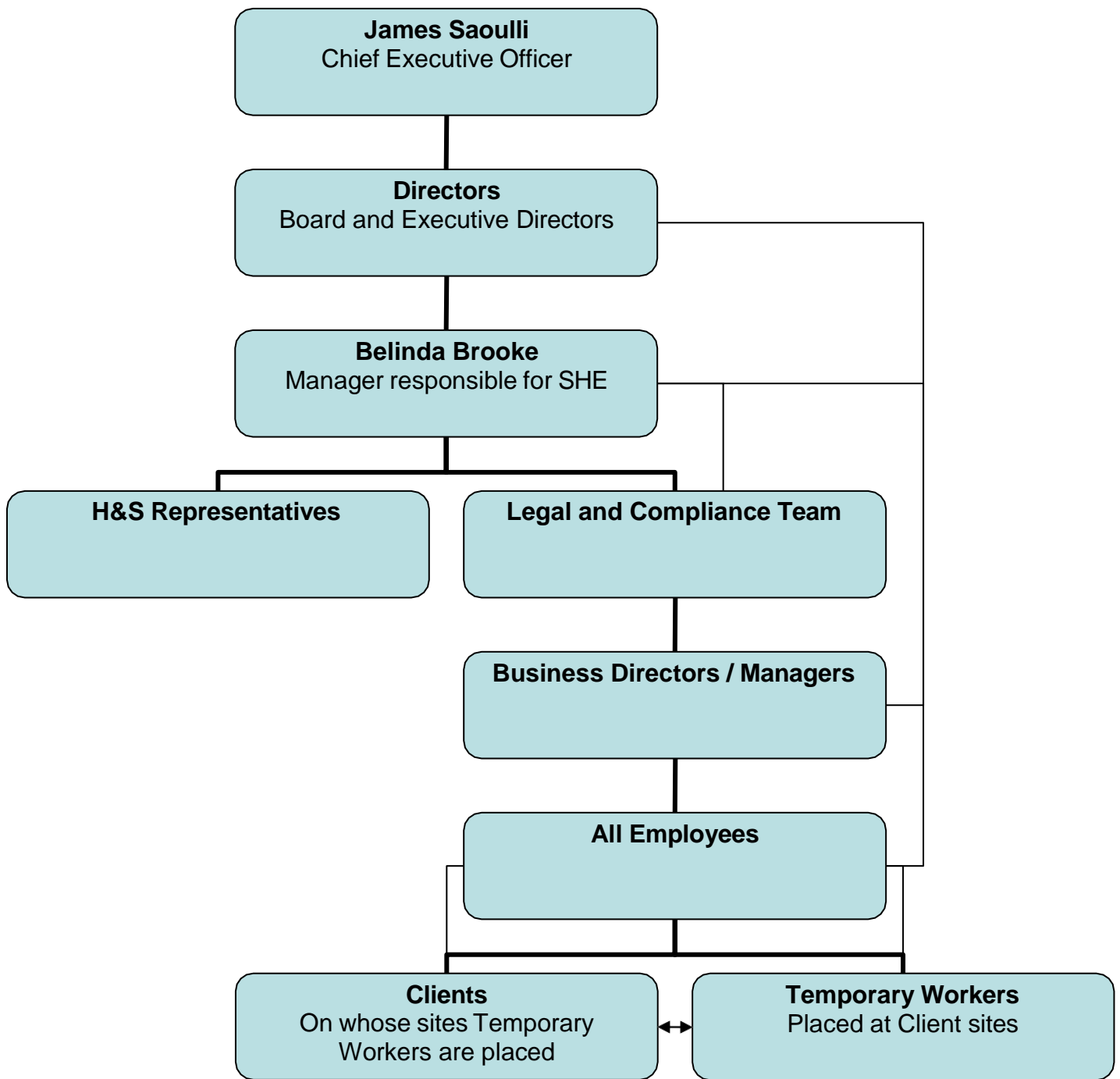
Rullion Build Ltd
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Rullion Solutions Ltd

There are approximately 220 employees represented, and the organisation places in the order of 6000 temporary workers per week into host employer's (Client) sites, as well as a number of permanent employment placements with Clients.

Rullion is an office-based company providing a service offering. There are no manufacturing processes, or raw materials used for production. The environment is considered very low risk.

The Management Organisation, and Health and Safety Organisation for Rullion is shown in the Organisation Chart overleaf.

2.2 Organisation Chart



2.3 Health and Safety Responsibilities

1. The Director with overall responsibility for Health and Safety is James Saoulli, CEO.

2. Responsibility at Corporate level, for approving and initiating Health and Safety Policy, procedure and expenditure, and for promoting best practice in the business:

BOARD OF DIRECTORS

Chief Executive Officer
Vice Chairman
Finance Director

3. Responsibility for development of Corporate Health and Safety Policy and Procedures for Board approval, development of Management System, liaison with Group Staff, assistance with Accident Investigation and Risk Assessments and providing legal updates, provision of Health and Safety advice, guidance, reporting and training as appropriate:

Manager responsible for Safety, Health and Environment
In consultation with Health and Safety Representatives, and Solicitors (where applicable).

4. Responsibility for adopting Board approved Corporate Health and Safety Policy and procedure into each individual Rullion Business, budgeting for Health and Safety issues at Company level, initiating and implementing specialist Health and Safety requirements relevant to individual industry sector:

Executive Directors

5. Co-ordinating and implementing Health and Safety procedures within each individual company and reporting for Corporate purposes. Reporting accidents, incidents or near misses as identified by staff and management.

Legal and Compliance Team - H&S@rullion.co.uk

6. Managing Health and Safety Policy and Procedures on a daily basis, at Company and Location level and ensuring all staff are aware of the Health and Safety Policy and their responsibilities, reporting on Health and Safety issues to Directors, the Manager responsible for SHE and Business Services Manager:

Directors, Executive Directors, Business Managers and Line Managers in accordance with the management structure of the company.

7. First Aid treatment and reporting. Liaison with Emergency Services in the event of accident, injury, emergency in each Location:

Qualified / Appointed first aiders for each location

8. Fire Arrangements – including training, Location evacuation procedures, Location fire arrangements and signage:

H&S Policy 2023



Health and Safety representatives and risk assessors, appointed fire marshals, location administrators

9. Conducting Health and Safety training and risk assessments, and co-ordinating relevant paperwork for group in relation to this:

Health and Safety representatives for each location and the People Team.

10. Individual Health and Safety responsibilities – Ensuring that no actions taken endanger others in the workplace, identifying hazards co-operating with any control measures put into place by the Company to ensure their health and safety and meet its legal responsibilities

All employees

Specific responsibilities relating to specific arrangements are illustrated in each section of this policy.

2.4 Competent Health and Safety Assistance

The person responsible for providing Health and Safety assistance to Rullion in accordance with Regulation 7 of the Management of Health and Safety at Work Regulations 1999 (as amended) is the Manager responsible for SHE.

However, the company acknowledges that specialist advice may be necessary from time to time. When this is required the services of a competent Health and Safety Consultancy or solicitors shall be obtained.

3. GENERAL DEFINITIONS:

For the purpose of this document and for the avoidance of doubt, the following definitions apply:

Company and Recruitment Business

Rullion Limited

An organisation which supplies persons to act for, and under the control of, other persons (the Client) in any capacity. (Temporary workers / Permanent placements)

Contractor

An individual hired on a temporary or short-term basis to work within Rullion's recruitment business under the supervision, direction and control of Rullion.

3rd Party Contractor

An external organisation or person, with whom Rullion has contracted to undertake work on its behalf, where the contractor has control over all or part of a project and where the contractor provides all materials equipment and labour to undertake the works.

Temporary Worker

An individual seeking work with third parties and registered with Rullion's recruitment business for this purpose. The person will be placed with Clients on a Contract for Services as a self-employed worker. Rullion will make statutory deductions only and supervision direction and control of activities lies with the Client.

Ltd Co Worker (Temporary)

A Temporary Worker employed by or a Director of a Limited Company (Ltd Co.) where the Ltd Co. has contracted with Rullion's employment business for the supply of services, via its personnel, to a Rullion client.

Contract for Services

The terms and conditions of the relationship and arrangements between Rullion and the Temporary Worker: The Worker has self-employed status and is neither employed by the hirer or the employment business. There is no mutuality of obligation between the parties and in any placement the worker operates under the supervision direction and control of the Client.

Client

The Client is the organisation or the person (including another employment business in a second-tier supplier arrangement) to whom an Employment Agency or Business introduces or supplies, or holds itself out as being capable of introducing or supplying, a work seeker (Temporary Worker)

4. ARRANGEMENTS

4.1 Risk Assessments and Work Procedures

Risk Assessments are carried out on all Company activities on all areas of work. Risk Assessments are carried out by the Nominated Risk Assessors, i.e., the persons nominated by each company, who have attended the Risk Assessors course. The Nominated Risk Assessor is responsible for:

- Carrying out the risk assessments and producing work procedures for the area or undertaking for which they have been nominated
- Issuing the risk assessments and procedures
- Reviewing and amending risk assessments and procedures when required and at least annually or on receipt of any Accident, Incident, or Unsafe Condition Report
- Providing feedback on the Health and Safety Management System to the Manager responsible for SHE and Board of Directors

The Risk Assessments are performed in accordance with the principles and methodology described in Section 35 of the documentation – “The Principles of Risk Assessments”.

Risk Assessments are recorded using the forms published on the Intranet.

Business Services is responsible for ensuring that risk assessments and work procedures are understood and implemented within their areas of responsibility and that all their employees and operatives have received:

- Information and instruction on the risks involved with their work including copies of the Risk Assessments and Work Procedures
- Appropriate training on the Work Procedures (safe method of working)
- Correct equipment and tools (where appropriate) for the work
- Appropriate PPE (where identified as necessary)
- Monitoring and ensuring staff compliance with company procedures

Auditing of the Risk Management Process is carried out by the Manager Responsible for SHE, or other appointed external consultant.

4.2 General Risk Assessments

The Risk Assessments undertaken will follow the subjective (qualitative) approach.

General Risk Assessments are undertaken to determine occupational hazards associated with activities processes, equipment, workplace substances and the like.

The risk assessments will identify the hazards and risks and the necessary control measures to be taken during the activities ongoing within each office. The risk assessments will take account of the hazards arising from contractors undertaking work at Group or Company premises.

Risk Assessments will identify any additional assessments that are required e.g., Working at Height, Hazardous Substances (COSHH), Manual Handling, Use of Display Screen Equipment, Fire etc. These then need to be carried out as part of the process.

Where a particular location presents hazards or risks not covered by the generic risk assessments or Work Procedures then the Nominated Risk Assessor shall prepare a site-specific Risk Assessment and Work Procedure.

A separate file containing all risk assessments and method statements will be maintained by the Business Services Team.

4.3 Clients' Risk Assessments

Rullion will request and record any information regarding specific hazards and controls at Client Sites relating to each placement. It is the Client's legal duty to ensure this information is communicated to Rullion. Rullion will ensure that any information provided by the Client is communicated to the Temporary Worker verbally and in writing.

Temporary Workers are subject to Client Risk Assessments whilst working under their supervision, direction and control and it is the Client's responsibility to ensure that these are made available to and undertaken for any Temporary Worker supplied to them.

4.4 The Health and Safety Policy Documentation

This completes the introductory element the Health and Safety Policy. There exist a number of additional documents to this policy which cover the remaining requisite elements that are specific to either Rullion, the individuals employed by Rullion, and our temporary and contract workforce when and if applicable.

The following provides a list of all the information sheets and systems which can be included with this policy to provide a comprehensive Health and Safety document pertinent to Rullion. Alternatively, they may be used individually or collectively for specific purpose.

The complete document is available on the intranet.

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SECTION 5. EMPLOYEE CONSULTATION

Employees are encouraged to provide feedback on all Health and Safety issues in accordance with the Health and Safety (Consultation with Employees) Regulations 1996 (as amended)

To ensure this process occurs in a structured manner the company will communicate with employees in the circumstances listed below, and will pay due regard to the feedback and recommendations arising from these

On any occasion where any new measure is introduced into the workplace which may substantially affect the health and safety of the employees:

- The appointment of Competent Health and Safety assistance required under Regulation 7 of the Management of Health and Safety at Work Regulations 1999
- The nomination of competent persons to assist with emergency evacuation of premises
- Any Health and Safety information to be provided e.g., results of risk assessments and work procedures
- Health and Safety training
- The introduction of new technologies

Where the above circumstances occur, the Manager responsible for SHE or the appropriate Director/ Manager will arrange a suitable forum (e.g., a meeting, email, discussion group) for the relevant employees, where the proposed issues will be discussed and reviewed.

The details of the consultation forum and feedback from the consultation will be communicated to all relevant staff using the Intranet notice board and where appropriate a newsletter. The Board of Directors must ensure suitable action is taken on the recorded issues. Significant issues, which have implications throughout Rullion, should be reported by the Manager responsible for SHE or CEO to all staff.

When consultation takes place at a pre-defined meeting where some employees are not able to attend, e.g. for operational reasons, care should be taken to ensure that they are given the opportunity to express their opinions and are informed of decisions.

Employees who become aware of any unsafe circumstances, unsafe condition, machinery, method of working etc. must immediately inform the Company via the process described in Section 6 “Accident and Incident Reporting and Investigation”.



SECTION 6. ACCIDENT AND INCIDENT REPORTING AND INVESTIGATION

Rullion will operate one of two different processes for accident reporting depending on who the injured party is:

1. Reporting of accidents relating to Rullion employees
2. Reporting of accidents for Temporary Workers contracted for services to Clients.

6.1 Definitions

The following definitions will assist in classifying and reporting accidents and incidents.

Accident - An unplanned, uncontrolled event, which leads to injury to persons and possibly damage to plant, equipment, property, etc.

Incident - An unplanned, uncontrolled event, which leads to damage to plant, equipment, property, etc. (but not resulting in injury)

Near Miss - An unplanned, uncontrolled event, which could have led to injury to persons or damage to plant, equipment, property etc. but did not.

Unsafe Condition - An unsafe condition or workplace, which could lead to injury to persons or damage to plant, equipment property etc. if not rectified (for example exposure to trip hazard, unguarded moving machinery, biological agent etc.).

6.2. Specific Responsibilities

Rullion Staff:

Staff are responsible for ensuring they are familiar with the accident/incident reporting procedures and for adhering to these both in relation to reporting Rullion employee accidents/incidents and also in relation to Temporary Worker accidents/ incidents. All staff and Temporary Workers have a duty under Reg. 25 of the Social Security (Claims and Payments) Regs1987 to report either orally or in writing, any personal injury. This duty is satisfied by completion of the accident book.

Temporary Workers:

It is the responsibility of every Temporary Worker to report any accident, incident or near miss, however minor to:

- Their employers (for Ltd Co. Workers only)
- Their line manager/supervisor at the Client site – in accordance with the Client's accident reporting procedure
- Rullion via their designated consultant

All accidents resulting in injury **must** be entered into the accident book at the site where the Temporary Worker is placed and **NOT** in the Rullion accident book.

Some Clients will have a 'near miss reporting procedure' for the purposes of accident prevention. Temporary Workers must adhere to any Client rules relating to accident, incident and near miss reporting whilst on site.

Rullion Clients:

Rullion Clients are encouraged to report any accidents, incidents or near misses involving a Rullion supplied Temporary Worker to the relevant Rullion Company, in order that Rullion can work with the Client where required to assist with any investigations and to help prevent further occurrences. Clients are also requested to forward copies of any data relating to the accident (accident book entry, accident investigation, RIDDOR report etc.) to Rullion.

6.3 Accident Reporting Requirements

RIDDOR Reporting

Under certain circumstances accidents, incidents, dangerous occurrences and cases of occupational related disease must be reported to the Health and Safety Executive. This requirement is known as a RIDDOR report as it falls under the requirements of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013. Such instances are classified as follows:

Death or Specified Injuries

These include:

Death	Broken bones (excluding digits)	Amputations
Dislocations	Loss of sight	Eye injuries
Loss of consciousness	Any injury requiring resuscitation or admittance to hospital for > 24 hours (i.e., electric shocks etc.)	Serious Burns

Reportable Occupational Diseases

Advice must be sought from the Manager responsible for SHE if a case of occupational disease is suspected.

This list includes diseases such as:

Occupational asthma	Repetitive strain injury	Carpel tunnel syndrome
Hand arm vibration	Certain cancers	Asbestosis
Mesothelioma	Tetanus	TB
Hepatitis	Leptospirosis	Rabies

These diseases must be linked to a certain activity in order for it to be reportable.

Reportable dangerous occurrences

There are over 27 categories of dangerous occurrences specifically listed in the legislation - please check with the Manager responsible for SHE if in doubt. The types of occurrences covered include:

Fires or explosions	Collapse of a building or structure	Explosion of, or failure, or leakage, from a pressurised vessel
Accidental release of a dangerous substance	Collapse, failure, or overturn of lifting machinery	Release of biological agents
Malfunction of radiation generators	Malfunction of breathing apparatus	Collapse of scaffolding
Train collisions etc.		

These are examples only. If an incident occurs, please obtain guidance about whether it is reportable or not.

Road accidents involving work

These include:

Exposure to dangerous substances	Injury whilst loading or unloading	Any construction, demolition, alteration or maintenance activities on public road
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Gas Incidents

Any leakage or explosion of gas that results in an injury.

This relates to gas fitters, or gas suppliers i.e., fillers, importers or suppliers of gas through fixed pipe distribution systems or refillable containers containing LPG.

6.4 Accidents Occurring at Rullion Premises

Immediate Action

In the event of any circumstance, accident, incident, near-miss, unsafe workplace or unsafe condition occurring, that puts employees or others at personal risk within Rullion Premises, the following steps should be taken:

- Secure the area or workplace where it is practical and safe to do so, so as to ensure that employees or others are not put at risk
- Contact Emergency Services, if appropriate, and ensure that first aid is administered
- Where it is not safe to continue working - stop work until suitable steps have been taken to ensure that it is safe to continue working
- Report the incident to your line manager
- Seek medical assistance if required
- Enter the details in the Location/site accident book
- If the incident is serious, notify the Manager responsible for SHE - you may be asked to help complete an accident investigation form and to complete a statement
- If an accident occurs at Client's premises, follow the Client's accident reporting procedure and ensure the incident is entered in their accident book

6.5 RIDDOR Reporting

The responsibility for reporting accidents through RIDDOR depends whether the injured party is an employee of Rullion or a Temporary Worker.

Injured Person is:	Responsibility lies with:
Rullion Staff	Rullion. The Legal and Compliance Team must complete RIDDOR reports, or in their absence a Location Manager.
PAYE Temporary Workers	The Client. They have 'control over the working premises and activity'; however, if they do not, or will not report the incident, then Rullion will do this to ensure that the legal duties are upheld.
Ltd Co. Temporary Workers	The Ltd Co. should report the incident because it is the 'employer' of the Temporary Worker however the Client or Rullion could enter a report if required to ensure that the legal duties are upheld.

All RIDDOR reports must be submitted within **10** days of the incident occurring where specified injuries occur, or within **15** days for accidents resulting in incapacitation of over 7 days. In the case of a death at work, the relevant Enforcing Authority must be informed immediately by phone (see section on completing a RIDDOR report below).

It is important to ensure that any RIDDOR report illustrates the following (where appropriate):

- The accident happened at the Client site
- Rullion is a recruitment agency with no supervision, direction or control on site
- For Ltd Co. Workers, the employer should be recorded as being the Ltd Co. that they work for.

It is important that good lines of communication are maintained with both the Client and the injured party in the event of an accident, to ensure:

- That only one RIDDOR report is made per incident
- That the details included in the report are correct
- That the reporting timescales are adhered to

Reference should be made to the flow charts in Appendices A and B to establish the accident reporting duties relating to Rullion employees and Temporary Workers assigned to a Client by Rullion.

Completing a RIDDOR Report

All RIDDOR reports are now made to the Incident Contact Centre (ICC) using either:

1. Phone on 0345 300 9923 (Monday to Friday 8.30am – 5pm)
2. Internet: www.hse.gov.uk/riddor (online forms)

The ICC will guide callers through completion of the relevant details and a confirmation of the form will be sent to the reporter usually by email. If there are any amendments required, the ICC must be notified immediately.

- F2508 form is used for injuries or dangerous occurrences
- F2508A form is used for diseases

In the case of very serious incidents or death, the relevant enforcing authority must be notified immediately by telephone.

The Enforcing Authority will either be the local Health and Safety Executive (HSE) office or the Local Authority Environmental Health Department, dependent on the nature of the business. The contact details should be displayed on the Location H&S Law Poster.

If an incident occurs and staff are in any doubt about whether an incident should be reported, how to report it, or where it should be reported to, the Manager responsible for SHE should be consulted for advice.

Copies of RIDDOR reports, accident book entries and accident investigation reports MUST be obtained, and a copy forwarded to the Manager responsible for SHE.

6.6 Accident Investigation

Any serious accident occurring at a Rullion site must be entered in the site accident book and a copy sent to the Manager responsible for SHE. An accident investigation will then be undertaken by the Manager responsible for SHE in conjunction with the Location manager or Business Services Team for the Company. The Accident Investigation Report template can be found on the Intranet in the Health and Safety File.

Client Sites

If an accident occurs at a client site and Rullion is informed, accident paperwork must be requested from the Client as follows:

- Copy of the accident book entry
- Copy of the client's accident investigation report or near miss report
- Copy of the RIDDOR report (where applicable)
- Copies of any witness reports or safety reps' reports

This documentation should be forwarded to the Manager responsible for SHE in Altrincham so that the records can be held centrally and investigated as appropriate.

Provided this information is forthcoming and sufficient to allow Rullion to assess the situation and confirm that there is a safe working environment, and that suitable preventative action has been taken (where applicable), no further paperwork will be required.

If no paperwork is forthcoming from the Client and the incident is minor, then no further action will be required. The Legal and Compliance Team must annotate the accident-reporting log with the incident details, so that this information can be taken into account when considering accident statistics and trends.



If no paperwork is forthcoming and this is a major accident, the Manager responsible for SHE will require the contact details for the person responsible for Health and Safety at the Clients premises and will then liaise with the person concerned to ensure that a Rullion accident investigation report is completed and where required, that appropriate preventative action is taken.

6.7 Incidents, Near Misses or Unsafe Conditions.

Reporting

Any incident, near miss or unsafe condition, must be reported to the Legal and Compliance Team and must be logged on the Accident Reporting Log under 'Other'.

The Health and Safety Representatives or Manager responsible for SHE will be responsible for investigating incidents, near misses or unsafe conditions through a risk assessment process and implementing corrective actions accordingly.

Temporary Workers Reporting

Temporary Workers must report all incidents or unsafe conditions or near misses in accordance with the Client's reporting procedures on site, and by:

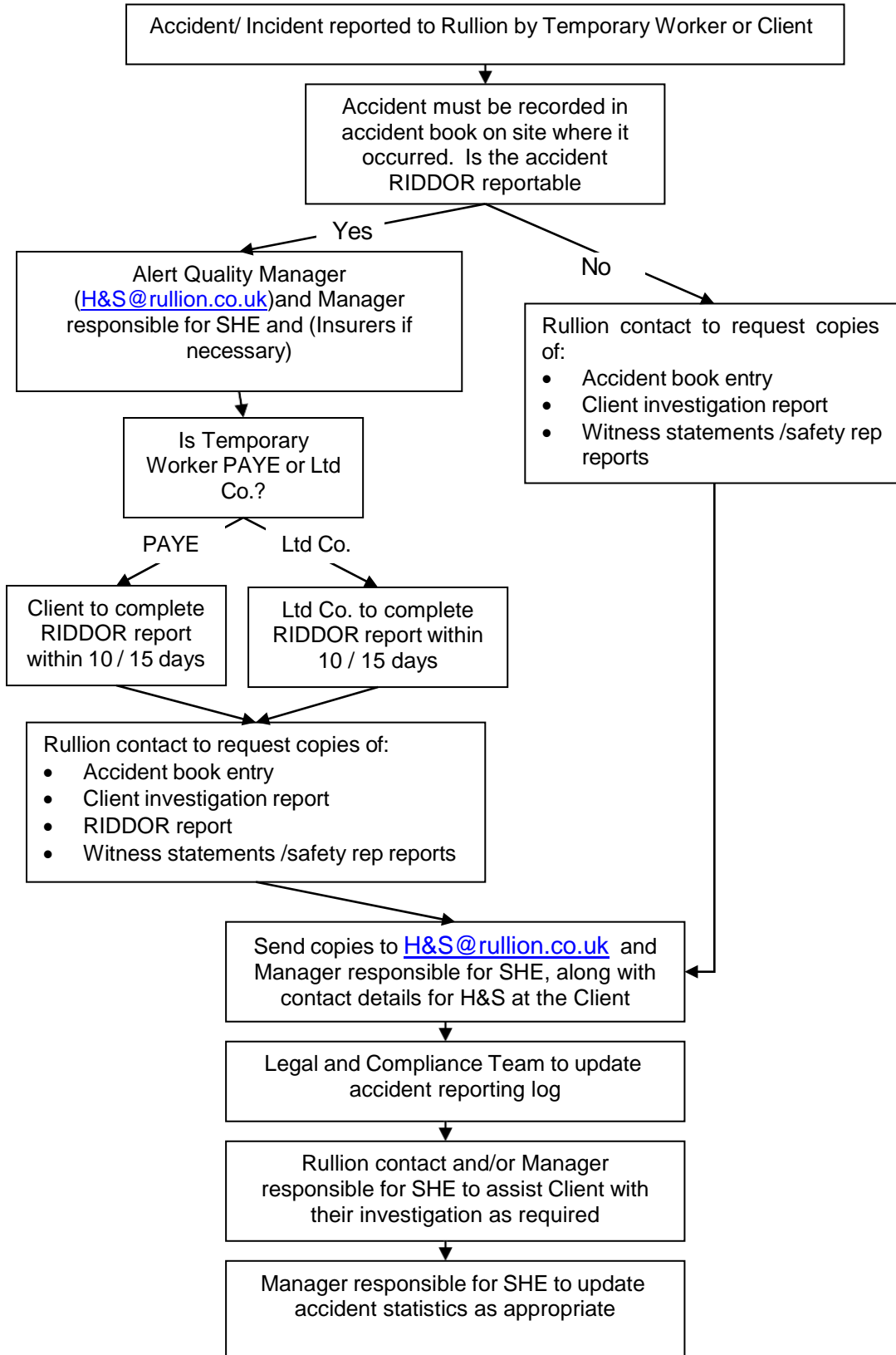
- Telephone immediately to their Rullion Point of Contact (RPC)
- The RPC receiving the report shall then initiate the procedure as outlined in Appendix A

Limited Company Workers are required to ensure their own reporting procedures are set up to meet this requirement.

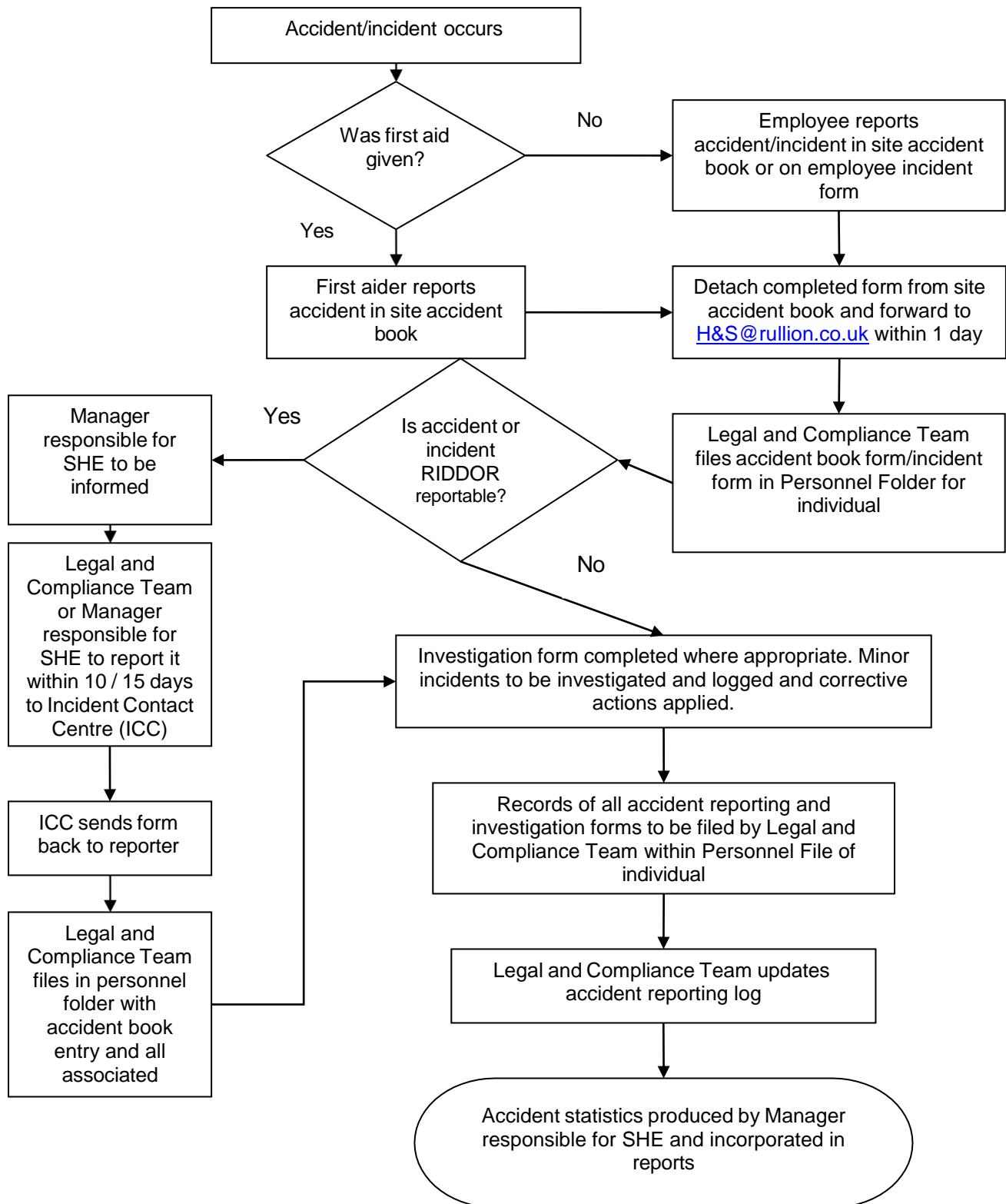
6.8 General

If any incident arises and there is any doubt about how to proceed, please seek advice from the Manager responsible for SHE.

Appendix A - Temporary Worker Accident Flow Chart



Appendix B - Staff Accident Flow Chart



SECTION 7. FIRST AID ARRANGEMENTS

7.1 Definitions

First Aiders:

Appointed persons - someone appointed by the Company to:

- take charge when someone is injured or falls ill, (which may include calling an ambulance if required)
- monitor the first-aid equipment, e.g., restocking the first-aid box

Appointed persons should not attempt to give first aid for which they have not been trained. Short emergency first-aid training courses are available, and it is recommended that relevant personnel attend an appropriate course.

First Aiders - An individual who has successfully completed an HSE approved First Aid at Work course or an Emergency First Aid at Work course (dependent upon risk level and employee numbers) with an approved training provider (i.e., St John's Ambulance, Red Cross, approved colleges).

A first aider can undertake the duties of an appointed person.

Persons selected to be first aiders should be suitable for the task and should preferably be volunteers.

7.2 Responsibilities

Staff:

All staff are responsible for ensuring they are familiar with the first aid arrangements in place and for adhering to Rullion procedures accordingly.

First Aiders:

First aiders are responsible for administering first aid within the workplace. It is good practice for first aiders to record details of any assistance administered.

7.3 Risk Assessment

The first aid arrangements required on each site will be determined by a risk assessment, which must take into account the activities on site, the number of personnel and the time it would be reasonably expected to be able to summon the Emergency Services. Advice should be sought from the Manager responsible for SHE.

7.4 Arrangements

Qualified first aiders are responsible for administering first aid as required or until the Emergency Services arrive or the patient is taken to hospital.

It is the responsibility of the appointed person or first aider to ensure that:

- First aid boxes and facilities are properly and adequately maintained and that they remain suitable for the number of staff on site
- First aid boxes are clean and dry and freely available to all members of staff
- The accident books are properly completed and any accidents or near misses are reported promptly to the Legal and Compliance Team

It is also the responsibility of the appointed person or first aider to call the Emergency Services if required.

The guidelines for first aid appointments in Rullion offices are detailed below:

Location Size	Appointments Required
Less than 25 staff	1 Appointed Person +1 person able to deputise in the event of holidays or other absence

25 to 50 staff	1 First Aider – trained in Emergency First Aid at Work +1 person able to deputise
Over 50	1 First Aider – trained in First Aid at Work +1 person able to deputise

The above guidelines will meet with the Approved Code of Practice and facilitates cover for holiday and other absences.

Rullion considers itself to be low risk.

7.5 Other considerations

Management must consider the following and make appropriate arrangements:

Arrangements for Staff who are mobile.

Rullion employees who require first aid assistance whilst visiting Client (or others) sites must inform their host and follow the Client's procedures. This includes reporting any accident within the Client's accident book as per Section 6 Accident / Incident Reporting and Investigation.

Out of hours working/shift working.

If any member of staff is required to work out of normal working hours or on a shift basis, local management must ensure that suitable first aid arrangements are made. Employees must be provided with:

- Access to first aid boxes and accident book
- Detailed information about any specific risks that they may be exposed to
- Written instructions on what to do in the event of an accident or injury
- Contact and location details for the local Emergency Services
- Emergency transport facilities in the event of an accident or injury
- A telephone or mobile phone to summon help in the event of a problem arising

Shared Accommodation (shared tenancy)

Where Rullion offices are in shared accommodation (i.e., multi tenanted sites), first aid arrangements can be shared between tenants provided they are properly documented and agreed by all parties and that the arrangements are reviewed on a regular basis. Should this type of arrangement be deemed appropriate, arrangements must be put in place by the Location Manager in consultation with the Business Services Team and the Management Teams of other tenants.

Temporary Workers Provided to Rullion Clients

Temporary Workers supplied by Rullion do not operate on Rullion premises and are subject to the policies and procedures at the Client site where they are placed. First Aid arrangements must be provided by the Client.

Rullion consultants must ensure first aid provision is available when placing Temporary Workers, and in the event of any difficulties surrounding provision of this facility, the Consultant must liaise with the Client and the Manager responsible for SHE to ensure suitable arrangements are agreed. Rullion must ensure that client first aid arrangements are communicated to temporary workers as part of site induction.

Contents of a First Aid Box

There is no mandatory list of contents for a first aid box; this will depend on the number of employees on site, the outcome of a risk assessment and any special requirements identified. Guidance relating to contents for first aid boxes can be obtained from the HSE or the Approved Code of Practice and Guidance. A minimum stock of first-aid items would be:

- 1 leaflet giving general guidance on first aid (e.g., HSE leaflet "Basic advice on first aid at work");
- 20 individually wrapped sterile adhesive dressings (assorted sizes);

- 2 sterile eye pads;
- 4 individually wrapped triangular bandages (preferably sterile);
- 6 safety pins;
- 6 medium sized (12cm x 12cm) individually wrapped sterile unmedicated wound dressings;
- 2 large (18cm x 18cm) sterile individually wrapped unmedicated wound dressings;
- 1 pair of disposable gloves.

Additional items such as scissors, adhesive tape, blankets, aprons and other protective equipment may be stored in the container or nearby. Containers should protect their contents from dust and damp. Where mains tap water is not readily available for irrigation of eyes a minimum of 1 litre of sterile water or 0.9% saline should be provided in sealed, disposal containers.

First aid containers must be marked with a white cross on a green background and be easily accessible. The number and location of such containers will depend upon the size of the site and the number of employees; the risk assessment should help to clarify this.

First aid containers must be kept fully stocked. Further supplies to re-stock the container should be readily available. Used items or those which have passed their expiry date must be safely disposed of.

Tablets and other Medication

Tablets and other medication must not be kept in a first aid box, nor will Rullion provide such. If an employee requires medication, they should seek professional advice from a doctor or pharmacist.

Informing Employees

Rullion will inform employees of the first aid arrangements during their induction, and subsequently as necessary. Additionally, notices will be prominently displayed to inform staff who and where the first aiders or appointed persons are and where the first-aid box is. Special arrangements will be made to give first-aid information to employees with reading or language difficulties.

Disposal of Bodily Fluids

First aiders must treat all bodily fluids as potentially contagious since they may be infected with diseases, notably the human immunodeficiency virus (HIV) which may cause AIDS, and Hepatitis B. Wherever possible, protective clothing must be worn (e.g., disposable gloves and aprons) and equipment used (e.g. paper towels, waste bags, resuscitation aids).

Protective measures which must be taken include:

- Covering wounds, cuts and skin abrasions on hands etc. with waterproof plasters to prevent entry of infection
- Wearing disposable plastic gloves, aprons, etc. and using paper towels to mop up blood or other body fluids
- Controlling surface contamination by blood or bodily fluids by covering the spillage with sanitiser powder in accordance with the manufacturer's instructions. Disposable gloves and aprons should be worn
- Disposing of the materials used and any other soiled items safely, by placing them in plastic bags
- Washing soiled personal clothing in a washing machine using the hot water cycle
- Applying good basic hygiene procedures including hand washing after administering treatment. If it is not possible or feasible to don protective clothing, first aiders should always wash with soap and water any part of the body where contact with bodily fluids is made

SECTION 8. FIRE PRECAUTIONS

8.1 Responsibilities

Location Offices

Managers with the responsibilities for the office / location are also responsible for ensuring that the arrangements in each office comply with this policy and that site-specific arrangements are in place, including the appointment of a Fire Marshal who must recognise their responsibilities using the Fire



Marshal's Duties document. Location Managers are also responsible for ensuring that arrangements are in place for visitors and that this is communicated effectively.

The Business Services Team / Health and Safety Representatives are responsible for ensuring that fire risk assessments are undertaken and that suitable fire arrangements are in place at each office. This includes the recording of alarm test times and identifying appointed Fire Marshals.

Appointed Fire Marshals are responsible for ensuring that sites are evacuated and secured effectively and that appropriate communications are made with the Emergency Services. The Fire Marshal is also responsible for informing Rullion Management of any improvements required in the emergency evacuation processes relating to the respective premises.

Line Managers are responsible for ensuring that fire arrangements are properly communicated to staff and that staff comply with the rules at all times.

Staff

All staff must ensure they are familiar with the fire evacuation procedures, the whereabouts of the fire exits and the layout of the office/building.

8.2 Risk Assessments

Fire risk assessments will be undertaken for each Rullion location using the form Fire Safety Risk Assessment (available on the Intranet) in order to identify the requirements for the prevention and action in the event of a fire occurring. Fire risk assessments will only be completed by people deemed competent by the Manager responsible for SHE.

A copy of the fire risk assessment must be maintained on the site to which it applies, with a copy being sent to the Manager responsible for SHE. The Fire Risk Assessment will be reviewed on an annual basis, or sooner, if circumstances change at the site.

8.3 Arrangements

A notice illustrating the fire procedures and appointed Fire Marshals relevant to the respective Rullion site must be clearly displayed in the reception areas of all offices.

Each Location office must ensure that it has suitable and sufficient fire extinguishers and fire signs, in accordance with current Fire Legislation. Extinguishers must be fully operational and regularly maintained. Rullion has a contract with an approved supplier for the management of fire extinguishers and Locations should contact Business Services for assistance.

Effective waste management processes are required in each office to avoid the unnecessary build-up of flammable waste. Where possible combustible material (paper, cleaning materials etc.) are to be stored securely and only in sufficient quantities to meet requirements, to avoid unnecessary risks.

Electrical equipment must be maintained effectively in good condition and PAT tested on a regular basis to reduce the risks of electrical fires.

All new employees and visitors to Rullion offices must be notified about the fire procedures in the relevant building. This includes the location of the fire exits, firefighting equipment, and alarms, details about what the alarm sounds like when activated and any information about testing that may take place, who the fire marshals are, where the collection (muster) point is and the specific evacuation procedure for that building.

A record must be held at each Location of people who are in the premises, including visitors, for roll call purposes. **When attending or leaving Rullion premises, all staff and visitors MUST inform reception or sign in and out using the local office procedures.**

The Location Manager/Location Administrator should establish when fire alarm tests are taking place (in shared premises) or arrange regular fire alarm tests where Rullion has responsibility for the Building. Information relating to the frequency and times of fire alarm tests must be made available to everyone on site and the Business Services Team must be informed for the purposes of record maintenance. Regardless of who conducts a fire alarm test, records must be kept by the Location/site to confirm that the alarm has been heard in the Fire Logbook.

8.4 Emergency Lighting and firefighting equipment

Emergency lighting must be tested on a monthly basis and a written record must be kept of it. An annual discharge test of the emergency lighting must also be conducted by a competent person and recorded in the fire logbook.

8.5 Fire Evacuation Procedures

The guidelines detailed below are generic and demonstrate good practice. Each Location should personalise these arrangements to ensure that they meet the specific arrangements in place at each site. A standard poster is available on the Intranet for this purpose.

1. **If you discover a fire**, immediately operate the nearest alarm
2. Do not attempt to fight a fire unless you are confident that there is no risk to your safety and that of others and you understand how to operate the firefighting equipment safely
3. **On hearing the fire alarm**, leave the building by the nearest exit. Do not use lifts or escalators
4. Do not go back to collect personal belongings. Assist anyone who is disabled or injured but **DO NOT** put yourself at risk
5. Do not panic – remain calm
6. Do not run or push - this can result in injury and slows down the evacuation process
7. Once out of the building call the Emergency Services (999) ask for the fire brigade and report the fire. You will need to provide concise details about your address/location and the circumstances
8. Proceed to the appointed assembly point
9. A roll call will be taken. If anyone is missing please inform the Fire Marshals or the Fire Brigade – **DO NOT** return to the building
10. **DO NOT** re-enter the building until the Fire Marshal or Fire Brigade have ensured the building is safe and have given authority to do so

SECTION 9. PERSONAL PROTECTIVE EQUIPMENT (PPE)

9.1 Responsibilities

Location

Location/Line Managers are responsible for ensuring that where PPE is deemed necessary for their Location that it is readily available, and that staff are trained in its use.

Staff

Rullion employees assessed as requiring PPE are responsible for using it as directed and reporting any defects immediately to their manager or Business Services for replacement.

9.2 Risk Assessment

A risk assessment will be conducted of all activities taking place within Rullion premises. Where hazards cannot be controlled by any other means, personal protective equipment will be supplied as required. Risk assessments will be completed by Business Services with additional support and guidance where needed from the Manager responsible for SHE.

9.3 Rullion employees

The Company will provide all necessary Personal Protective Equipment (PPE) for employees to carry out their work.

The need for personal protective equipment and its type shall be established by the Risk Assessment and noted in the control measures.

PPE will be issued locally, at each individual Location.

Employees shall wear and use the provided PPE in accordance with the manufacturer's instructions and in the circumstances identified as necessary by the Company. Employees shall not misuse or damage any PPE provided.

Employees shall inspect their issued PPE daily before use. Any damage or defects shall be reported immediately to the issuer for maintenance or replacement.

The issue of PPE will be recorded in the site Personal Protective Equipment Register.

9.4 Temporary Workers

Temporary Workers placed for work with Rullion clients, through the recruitment business, will be responsible for the supply of appropriate PPE as specified by the Clients in accordance with their Contract for Services unless alternative arrangements for supply are communicated verbally and confirmed in writing.

Rullion consultants will be responsible for establishing Client PPE requirements and communicating this to Temporary Workers verbally followed by confirmation in writing.

Where Rullion provides any PPE to Temporary Workers, it will be to Client specification and Temporary Workers will be required to confirm allocation of PPE.

Any PPE not returned to Rullion when a Temporary Workers ceases to work on placements through Rullion will be charged to the individual concerned.

Temporary workers have responsibility for inspecting any PPE allocated to them by Clients or Rullion (the issuer), on a daily basis, for maintaining it to a reasonable standard suitable for use and for reporting any defects to the issuer immediately so that replacements can be supplied.



Limited Company Workers are required to ensure supply of PPE through their Ltd entity/employer to meet client requirements as communicated by Rullion.

9.5 Prescription Safety Eyewear

Where employees and contractors require prescription safety eyewear, Rullion will provide a voucher for the Specsavers Corporate Eyecare Scheme. This will entitle the holder to a pair of prescription protective glasses or goggles from the specified range, at no cost to the employee.

Corporate Eye Care Scheme:

- Employees should request a Safety Eyewear Voucher from the Business Services Manager by email
- A voucher will be sent to the employee by internal mail normally within 24 hours
- Employees should take their allocated voucher to Specsavers together with a current prescription, where they will be able to choose appropriate eyewear from the specified range

Details regarding Specsavers branch locations can be obtained from the Specsavers website at www.specsavers.co.uk.

Safety Eyewear for Temporary Workers

In some circumstances Rullion will have arrangements with Clients to provide specified PPE. Where this applies and Eyewear is included in the specification, Rullion will provide Temporary Workers requiring prescription protection with a Safety Eyewear Voucher.

Consultants should request vouchers from Business Services and vouchers will normally be posted by internal mail within 24 hours.

SECTION 10. WORK EQUIPMENT

10.1 Staff and contractors

The Company will supply suitable equipment and tools for the work being undertaken by its employees.

The Company will ensure that its employees are appropriately trained to use any work equipment provided.

Equipment and tools provided shall be used in accordance with the manufacturer's instructions and shall not be misused.

Employees shall visually inspect all tools and equipment on a daily basis prior to use. Any damage or defects shall be reported immediately to the issuer for maintenance or replacement.

The issue of equipment and tools will be recorded in the Equipment Register.

Daily inspection of equipment and tools is the responsibility of the person using it. Location office managers shall ensure that any required statutory testing and inspection occurs and shall ensure records are kept.

10.2 Temporary Workers

Unless otherwise specified, Temporary Workers will be provided with tools for the work being undertaken by the Client.

Where Temporary Workers are required to provide Work Equipment, this will be communicated in writing.

Rullion consultants will be responsible for establishing Client work equipment requirements and communicating this to temporary workers verbally followed by confirmation in writing.

Rullion consultants will be responsible for checking that Temporary Workers are suitably trained, experienced and qualified to operate any equipment required for a placement, in accordance with Client requirements. Rullion consultants will be responsible for recording training, experience and qualifications and for obtaining copies of any relevant professional or industry qualifications and/or accreditations, as verification for clients and/or relevant authorities on request.

Where Rullion provides any work equipment to Temporary Workers, it will be to Client specification and Temporary Workers will be required to undertake competency training and a test or provide proof of competency previously obtained. Rullion will; provide each Temporary Worker with instructions for safe operation and maintenance of any relevant equipment, including information on how to report damage or defect and obtain replacement equipment.

Formal inspections, testing and maintenance of equipment supplied through Rullion will be the responsibility of Rullion and will be recorded on a maintenance log.

Temporary Workers have responsibility for conducting visual inspections of any work equipment allocated to them by Clients or Rullion (the issuer), on a daily basis, and for reporting any defects to the issuer immediately so that replacements can be supplied.

Clients are responsible for ensuring that any equipment supplied to site by Temporary Workers or Rullion meets the Clients' operational and safety requirements before use and that it is only used for the purpose for which it was intended.

Clients have sole responsibility for any equipment they supply to Temporary Workers on site and must ensure that their equipment and processes meet legal requirements. Where Rullion has any concerns



relating to equipment supplied to Temporary Workers by Clients, it reserves the right to instruct workers to cease work in the interest of safe practice.

Any work equipment not returned to Rullion when a Temporary Worker ceases to work on placements through Rullion will be charged to the individual concerned.

Limited Company Workers are required to ensure that any supply of work equipment through their Ltd entity/employer meets client requirements as communicated by Rullion.

SECTION 11. NOISE

11.1 Introduction

The Company will take all reasonable steps necessary to ensure that the risk of hearing damage to employees who work with noisy equipment or in a noisy environment is reduced to a minimum. The Company also recognises that noise levels below those which cause hearing damage, in offices for example, can still cause problems such as disturbance, interference with communication and stress and will take all reasonable steps to reduce noise levels as far as possible. The Company will also take all reasonable steps to minimise the disturbance caused by noise from the Company's premises affecting people in the neighbourhood.

As Rullion's business is largely office based and there are no call centre arrangements, in general circumstances noise levels are low and would not impact on normal conversation and activities.

11.2 Responsibilities

Location Managers are responsible for notifying Health and Safety Representatives of any of any operation or activity involving significant noise.

The Business Services Manager is responsible for assessing noise impact and control measures when selecting new equipment for purchase.

Risk Assessors are responsible for conducting risk assessments for any activity where a significant risk is identified. Co-operation is required from all members of management and staff.

Staff are responsible for collecting information relating to hazards, risks and control measures at Client sites and communicating these, verbally and in writing to the relevant Temporary Workers when placing them on assignment.

11.3 Assessment of Noise

Noise Assessments

Where applicable, the Company will carry out regular noise exposure assessments of noisy:

- Areas
- Processes; and
- Equipment

These will be used as the basis for formulating action plans for remedial measures when necessary.

Reduction of Noise Exposure Levels

Rullion will, so far as is reasonably practicable, take all steps to reduce noise exposure levels of employees by means other than the use of personal protective equipment. Rullion accepts that the use of ear protectors is a last resort and is committed to continuing to seek and introduce alternative methods for reducing noise exposure levels whenever possible in the future.

Provision of Ear Protectors

Rullion will provide suitable and effective ear protection to employees working in high noise levels, as indicated as necessary by the results of noise exposure assessments. It will also provide for the maintenance, repair or renewal of the protective equipment, and will provide training in the selection and fitting of protectors and details of the circumstances in which they should be used.

Hearing Protection Zones

Rullion will designate and mark out hearing protection zones, which may include particular areas, operations or pieces of equipment. All personnel entering these zones will be required to wear ear protectors.

Use and Maintenance of Noise Control Equipment and Procedures

Rullion will maintain all equipment and monitor all procedures introduced for the purpose of reducing noise exposure of employees, such as:

- Enclosures
- Silencers
- Machine covers

Staff will be required to

- Use these procedures and equipment correctly
- Promptly report any defects or deficiencies via Business Services or their Line Manager

11.4 Training

The Company will provide adequate training to employees. All employees who are subject to high levels of noise will be provided with:

- Information, instruction and training about the harmful effects of noise
- Information and training on what they must do in order to protect themselves and meet the requirements of the law and of Rullion policy

Managers and supervisors responsible for formulating and carrying out the company's noise policy will also be given appropriate training.

11.5 Procedures for Dealing with Health and Safety Issues

Whenever an employee raises a matter related to noise in the workplace as a health and safety issue, the Company will:

- Take all necessary steps to investigate the circumstances
- Take corrective measures where appropriate
- Advise the employee of actions taken

Where a problem arises as a result of noise in the workplace, the employee must inform their Line Manager immediately.

11.6 Temporary Workers and Ltd Company Contractors

Rullion will obtain any information related to noise risks and hearing protection requirements from Clients when taking a labour order. This information will be communicated to Temporary Workers verbally and confirmed in writing. Please refer to PPE – Section 9.4

SECTION 12. CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH

12.1 Introduction

The Company acknowledges that no substance can be considered completely safe. All reasonable steps will be taken to ensure all exposure of employees to substances hazardous to health is prevented or at least controlled to within statutory limits.

The Company undertakes to control exposure by engineering means where reasonably practicable. If exposure cannot be adequately controlled by engineering means, appropriate personal protective equipment (PPE) will be provided free of charge after consultation with employees or their representatives.

All employees will be provided with comprehensive information and instruction on the nature and likelihood of their exposure to substances hazardous to health.

12.2 Responsibilities

Risk Assessors are responsible for conducting risk assessments in relation to any hazardous substances present.

Staff are responsible for collecting information relating to hazards, risks and control measures at Client sites and communicating these, verbally and in writing to the relevant Temporary Workers when placing them on assignment.

12.3 Arrangements

The Company will, in consultation with workers and their representatives, implement the following:

- An inventory of all substances hazardous to health to be kept on site and maintained, with appropriate hazard information
- Competent persons appointed to carry out risk assessments of the exposure to substances hazardous to health and advise on their control
- All operations which involve, or may involve, exposure to substances hazardous to health will be assessed and appropriate control measures will be taken if elimination or substitution of the substance is not possible
- Engineering controls will be properly maintained and monitored by planned preventive maintenance and annual performance monitoring to ensure continued effectiveness
- Any system of work, supervision system or any other similar measure will be reviewed at suitable intervals and revised if necessary
- All employees and others who may work in the affected areas will be informed of the purpose and safe operation of all engineering controls
- Personal protective equipment (PPE) will only be used as a last resort, or as a back-up measure during testing or modification of other controls
- The type and use of PPE will be carefully assessed and maintained according to manufacturers' instructions. If possible, the number of different types will be minimised to prevent mistakes in servicing or replacement
- Each assessment will be reviewed every 2 years and all operations using hazardous substances will be reassessed every three years
- Qualified professionals, where identified as being necessary by the assessment, will carry out health surveillance
- Employee health records of all exposures to substances hazardous to health will be kept for a minimum of 40 years
- All employees will be provided with comprehensive information and appropriate training on the nature of the hazardous substances they work with. Employees will be informed about any monitoring and health surveillance results
- All changes to control measures and changes of PPE will be properly assessed and no new substances will be introduced into the workplace without prior assessment

12.4 Procedures for dealing with Health and Safety Issues

When an employee raises a concern related to the use of substances hazardous to health, the Company will ensure:

- The hazard associated with the substance has been correctly identified
- The assessment of the use of the substance is correct and up to date
- Controls in place are adequate
- Any observed deficiencies in the control of the hazards are corrected
- Employees and any others affected by the hazard are notified of the results of the investigation and actions taken

If an identified exposure has taken place, those affected and their managers and representatives, will be informed immediately so that appropriate medical guidance can be obtained.

12.5 Information and Training

The Company will give sufficient information and training to ensure full understanding of the hazards to health posed by substances in the workplace and the importance of the control measures provided. Information will also be given to others who may be affected, such as:

- Third party contractors
- Contractors
- Visitors

Managers and supervisors of areas which use substances hazardous to health will be given additional training to ensure the proper management of the risks.

12.6 Safe System of Work

Risks within the Company are generally low as the business is a service operation not a manufacturing or production business.

Employees are encouraged to report defects and systems must be in place for prompt repair and for the provision of temporary replacement controls, e.g., personal protective equipment (PPE). The Company will ensure:

- Hazard information is kept up to date
- Assessments are reviewed every 2 years and reassessed every three years or when changes are made
- Employees are trained in the nature of the hazards and use of control measures
- Controls are maintained and monitored
- Documentation is comprehensive
- Employees are encouraged to report faults and problems

12.7 Temporary Workers

It is the responsibility of Clients supervising, directing and controlling the work being undertaken to conduct risk assessments in relation to Substances Hazardous to Health and to communicate this to Temporary Workers at their premises. The Company will obtain information relating to any relevant risks from Clients and will communicate all information provided to Temporary Workers prior to placement.

The Company will undertake an initial health assessment for Temporary Workers, however any health surveillance required as a result of site operations will be the responsibility of the Client.

Temporary Workers must co-operate with Clients' safety arrangements and observe safe systems of work.

SECTION 13. ASBESTOS

13.1 Asbestos Register

An Asbestos Register will be maintained by the Manager responsible for SHE, in consultation with the H&S Representatives and Business Services for our premises.

13.2 Asbestos Surveys

In the majority of instances Asbestos Surveys will be arranged by building landlords, where the premises are:

- Shared occupancy
- The landlord has responsibility for the fabric of the building and communal areas
- Where Rullion only has responsibility for maintenance of a small area of the overall building and this only relates to the internal décor and maintenance
- Where the landlord has access to the building plans etc.

Where the landlord's responsibilities do not extend to the above criteria as part of the lease agreement (i.e. if Rullion is the Sole occupier, or has complete maintenance responsibility) or where the landlord refuses to undertake an Asbestos Survey, then Rullion would arrange this to ensure legislative compliance and a safe working environment.

The surveys will be carried out by UKAS accredited consultants, whose surveyors have attended the relevant courses.

13.3 Risk Assessment

On the identification of any asbestos within Rullion premises, a risk assessment will be conducted, acting on advice from the consultants, to establish the course of action to be taken (i.e. whether to leave the asbestos in situ or to arrange for its removal).

13.4 Identified Asbestos

Where asbestos is identified, information will be recorded in the Asbestos Register.

Where no information regarding asbestos containing materials is available, it must be presumed that asbestos containing materials are present. This will be clearly marked in the Register.

Asbestos containing materials located in premises must be clearly labelled as containing asbestos so that there is visual clarity for anyone in the localised area.

13.5 Monitoring and re-inspection

All asbestos will be visually monitored at regular intervals as determined by risk assessment, and re-inspection will be undertaken by the landlords in accordance with their policy and procedures, or where Rullion has inspection responsibility, by a competent person as appointed by Rullion.

13.6 Training

Training will be provided to appropriate staff whose normal duties may bring them in to contact with asbestos containing materials.

13.7 Emergency Procedures

If anyone suspects that they have discovered asbestos containing material or that an area containing asbestos has been disturbed, the following action must be taken immediately:

- Evacuate the area and cordon the area off until a full assessment has been completed
- Report the finding to the Manager responsible for SHE and the relevant Managing Director
- The Manager responsible for SHE will arrange for a competent person (asbestos specialist) to undertake a full assessment of the situation

13.8 Third Party Contractors

Where a 3rd party contractor is appointed by Rullion or the landlord to undertake work in premises occupied by Rullion they must be provided with a copy of the Asbestos Register to illustrate the location and type of any asbestos identified.

Third party contractors should ONLY work with asbestos containing materials if they are suitably qualified to do so.

13.9 Damage or disturbance of Asbestos Containing Materials

Should asbestos containing materials be unwittingly or accidentally damaged the following procedures must be applied:

- Employees must inform the Location Manager
- The Location Manager must report the disturbance to the Manager responsible for SHE and isolate the area where the disturbed material is located
- The Manager responsible for SHE will arrange for a competent person (asbestos specialist) to assess the material and establish the remedial action required and costs for this
- The Manager responsible for SHE will inform the Board of Directors and progress remedial action works as required

SECTION 14. DISPLAY SCREEN EQUIPMENT (DSE)

14.1 Introduction

This policy is intended to ensure that staff and others using Display Screen Equipment (DSE) provided by Rullion can work comfortably with it and avoid risks to their health.

Through implementation of this policy, it is Rullion intention to fulfil the requirements of the Health and Safety (Display Screen Equipment) Regulations 1992 (as amended).

14.2 Responsibilities

Management must ensure that:

- All staff under their control complete a DSE risk assessment
- All staff under their control receive information, instruction and training relating to safe use of DSE on commencement of work with the Company
- Staff reporting problems relating to their workstation have their issues investigated and any recommendations progressed
- Reasonable adjustments are made for individuals with health conditions or disabilities
- Business Services is informed of any issues relating to DSE use, any discomfort or ill health believed to be associated with the use of DSE or exacerbated by DSE
- Policy is implemented locally
- Staff are adequately supervised
- Employees carrying out DSE work complete an initial health assessment, before undertaking the work

Risk assessors/Manager responsible for SHE are responsible for:

- Conducting and recording assessments
- Communicating the findings to relevant staff and management
- Reviewing progress of recommendations
- Training staff including the importance of rest breaks
- Investigating any health issues and recommending remedial action
- Ensuring safety arrangements for work involving DSE use are regularly monitored and reviewed

Employees must:

- Inform their departmental supervisor/line manager of any known disability or health condition which may affect their ability to work using DSE or be affected by working with DSE (this information will be treated confidentially)
- Comply with the instructions and training given regarding safe workstation set-up and use, including the need for regular changes of activity or breaks
- Ensure they use any equipment provided (as a result of assessment of their workstations) to minimise DSE health risks, e.g., document holders and footrests
- Report to their departmental supervisor/line manager any discomfort or health concern believed to be associated with the use of DSE (this information will be treated confidentially)

14.3 Information and Training

The Company will give sufficient information, instruction and training as is necessary to ensure the health and safety of workers who use DSE. This provision will also apply to those persons not in direct employment, e.g., contractors. Managers and supervisors who are responsible for users of display screen equipment will also be given appropriate training.

14.4 Arrangements

To secure the health and safety of workers, so far as is reasonably practicable, the Company will, in consultation with workers and their representatives:

- Carry out an assessment of each workstation (within 4-6 weeks of them commencing work), taking into account the display screen equipment, the furniture, the working environment, and the worker.
- Take all necessary measures to remedy any risks found as a result of the assessment.
- Take steps to incorporate changes of task within the working day, to prevent intensive periods of on-screen activity.
- Review software to ensure that it is suitable for the task and is not unnecessarily complicated.
- Arrange for the provision of free eye tests – refer to Eye Test Section.
- Arrange for the supply, free of charge, of any corrective appliances (glasses) where these are required specifically for working with display screen equipment.
- Advise existing employees, and all persons applying for work with display screen equipment, of the risks to health and how these are to be avoided.
- Take all necessary steps to investigate when an employee raises a health and safety matter related to the use of display screen equipment, and take corrective measures where appropriate.

14.5 Temporary Workers

Rullion will not provide DSE to Temporary Workers. Where Temporary Workers are required to work with DSE as part of their placements, it will be the responsibility of the Client to ensure that the appropriate equipment is provided, and that suitable and sufficient risk assessments are conducted in their workplace.

SECTION 15. ELECTRICITY AT WORK

15.1 Introduction

The aim of this document is to offer guidance to staff in relation to the Electricity at Work Regulations 1989. It is imperative that all staff are aware of their responsibilities under this act and follow simple procedures.

15.2 Definitions

Electrical equipment - anything used, intended to be used or installed for use, to generate, provide, transmit, transform, rectify, convert, conduct, distribute, control, store, measure or use electrical energy. The interpretation incorporates every type of electrical equipment and extends to include conductors used to distribute electrical energy such as cables, wires and leads.

Portable Electrical Equipment - equipment that has a lead (cable) & plug and which is, or can be, moved around from place to place e.g., kettles, heaters, fans, desk lamps, vacuum cleaners, photocopiers, fax machines, desktop computers etc. (this list is not exhaustive).

Fixed Electrical Installation - the wiring and any materials, conductors, circuits, transformers, sockets or generators used to route and provide the supply of electricity integrated in any premises.

15.3 General Statement

All reasonable steps will be taken to secure the health and safety of employees who use, operate or maintain electrical equipment. Rullion acknowledges that work on electrical equipment can be hazardous and it is Rullion's intention to reduce the risks as far as is possible.

The implementation of this policy requires the co-operation of all members of management and staff, as well as any contractors hired to carry out work involving electrical equipment.

When a problem arises related to electricity at work, employees must inform a responsible person immediately and Rullion will take necessary measures to investigate and remedy the situation.

15.4 Responsibilities

The Manager responsible for SHE is responsible for co-ordinating PAT and Fixed Installations Testing in consultation with Business Services and Location Management.

Staff

Staff are responsible for reporting any damage or defects they find to their Line Manager.

All employees are prohibited from bringing electrical equipment from home into the office for personal use unless approved by Rullion.

15.5 Arrangements for Securing the Health and Safety of Workers

Rullion will, in consultation with workers and their representatives:

- Ensure electrical installations and equipment is installed in accordance with IEE Wiring Regulations
- Maintain fixed installations in a safe condition by carrying out routine safety tests every 5 years or sooner (as determined by test results, risk assessments, legal requirements or as a result of change)
- Inspect and test portable and transportable equipment in accordance with legislative requirements unless test results, risk assessments, legal requirements or change illustrate that inspection and testing is required more frequently
- Promote and implement a safe system of work for maintenance, inspection and testing
- Forbid live working unless absolutely necessary, in which case a permit to work must be issued

- Ensure employees who carry out electrical work are competent to do so
- Exchange safety information with contractors, ensuring they are fully aware of and are prepared to abide by Rullion health and safety arrangements
- Provide suitable protective equipment if required, maintaining it in good condition
- Maintain detailed records

Equipment users can help Rullion maintain safe electrical appliances by reporting any damage or defects they find to their line manager. Employees are encouraged to look for any of the following signs:

- Damage, e.g. cuts, abrasion (apart from light scuffing) to cable coverings.
- Obvious loose parts or screws.
- Overheating (burn marks or staining).
- Bare wires.
- The outer covering (sheath) of a cable not being gripped where it enters a plug or equipment.
- Equipment poor performance.

Suspect or faulty equipment **MUST** to be taken out of use immediately, labelled 'DO NOT USE' and kept secure until examined by a competent person i.e. qualified PAT Tester.

All employees must make sure that:

- Electrical sockets are not overloaded (where an extension lead or 4-way extension lead is required, these must not be "daisy chained". Only 1 extension lead per wall/floor socket is permissible)
- Cables are kept off the ground whenever possible. If cables are permanently on the ground ensure that they are:
 - a. Protected from damage (the mains extension lead is an appliance)
 - b. Not a trip hazard
 - c. Kept as short as possible
- Insulating tape is not used to make joints or cover faults in cables
- They do not tamper with anything electrical
- Electrical appliances are only used in the environment for which they are designed
- Where possible, tools and plug sockets are switched OFF before equipment is plugged in or out
- Equipment is switched off and/or unplugged before cleaning or making adjustments.

15.5 Types of Electrical Testing.

Portable Appliance Testing (PAT tests)

These are tests undertaken by a qualified tester, on items of equipment that fall into the Portable Electrical Equipment category above. This would be any item of equipment that has a plug on it and can be plugged into a mains supply.

Fixed Installations Reports/Periodic Test Reports

These are electrical tests, undertaken by a qualified electrician, on fixed installations that fall into the Fixed Electrical Installation category above. This would be any part of an electrical supply, circuit, transformer, socket, generator, conductor and wiring that supply's electricity in a building. Test reports have either a Satisfactory or Unsatisfactory Status in Section G 'Summary of the Inspection'.

Satisfactory = the electrical installations meet all current standards and are safe. There may be minor rectification works identified in Section F 'Observations and Recommendations for Action to be Taken' however these will not be safety critical issues.

Unsatisfactory = the electrical installations do not meet current standards and may be unsafe dependent of the faults identified. Defects are scored in Section F of the reports, with scores from 1 to 4. Any issues scored 1 and 2 must be addressed as soon as possible. Items scoring 3 or 4 are recommendations for consideration.

15.6 Maintenance Schedule:

All electrical equipment and installations must be maintained to prevent danger. This includes a system of formal visual inspection and testing (see above), to check for safe conditions and identify any damages that may affect users' safety.

Experience of operating the maintenance system over a period of time, together with information on faults found, will be used to review the frequency of inspection.

PAT and Fixed Installations Testing will be arranged and co-ordinated by the Manager responsible for SHE in consultation with Business Services and Location Management. Where Rullion employees operate from a client's site the testing will be in accordance with the PAT testing policy of the client.

PAT testing

Portable Appliances will be tested regularly by a qualified / trained tester.

All electrical items tested will be labelled and logged to illustrate:

- The test date
- The date of the next test
- Pass or Fail
- The location / appliance ID number
- The Company that conducted the test
- Testing will be arranged and co-ordinated by the Manager responsible for SHE.

New Offices/Office moves – All items in new offices or transferred to replacement offices will be tested at the next scheduled test.

A copy of the PAT test log will be sent to site and a master copy will be held by Business Services.

Fixed Electrical Installations Testing/Periodic Testing

In shared premises run by a Management Company or Landlord, the landlord will be responsible for the installations testing prior to any Lease/Licence being signed.

It is the responsibility of Business Services to obtain a copy of the current 'Satisfactory' test certificate (valid for 5 years) relevant to any premises Rullion occupy, at the outset of the lease/licence. A copy of this document must be provided to the Manager responsible for SHE.

It is the responsibility of Business Services to clarify with the Management Company / Landlord, where ongoing responsibility for fixed installation testing will lie:

- In serviced premises this is generally with the Management Company
- In leased premises this would normally fall to the tenant i.e. Rullion

Where possible, clarification on liability for fixed installation testing should be written into the lease or licence agreement.

On expiry of any relevant certificate, where Rullion has testing liability, electrical installations testing will be undertaken by an external contractor appointed by Rullion and an appropriate certificate will be issued.

Unsatisfactory Reports:

Landlords/Management Company commissioned reports – Business Services must liaise with the Landlord/Management Company to ensure that they undertake the required remedial works and to obtain a 'Satisfactory' report. Where this forms part of a new lease/licence, this should be obtained or agreed in writing prior to commitment to the lease/licence.



Rullion commissioned reports - Quotations must be obtained by the Business Services Manager to effect remedial work. Where possible rectification works should be undertaken by qualified electricians appointed by Rullion, so that a Satisfactory report can be supplied immediately, however this is at the discretion of the Managing Director of the relevant business. The Manager responsible for SHE will co-ordinate quotations from the approved electrician, all other quotations are the responsibility of the Business Services Manager.

15.7 Third Party Contractors.

Third Parties contracted to undertake works in Rullion premises involving the use of electrical equipment must be evaluated to ensure that their equipment will not cause injury or damage to the contractor, Rullion employees and premises or any other individual. It is the responsibility of local Location management to ensure that the equipment brought to site by the contractor:

- Is maintained and in good condition
- Has been PAT tested and has passed and is not overdue for a further test
- Is not going to present a hazard to Rullion employees and non-employees whilst in use i.e. trip hazards/sparks/exposed cutting parts etc. This may involve segregating off a working area to avoid an unsafe workplace

For guidance, please consult with the Manager responsible for SHE.

15.8 Information and Training

Rullion will provide information, instruction and training for all employees to enable them to carry out their duties without putting their health and safety at risk.

Electrical work will only be carried out by competent persons. DIY competence is not deemed to be acceptable within Rullion premises. If there is a need to conduct electrical work by an in-house member of staff they will be adequately trained and their appointment will be authorised by the Manager responsible for SHE.

SECTION 16. MANAGEMENT OF THIRD-PARTY CONTRACTORS

16.1 Safety Rules and Procedures

For the purpose of this procedure the term contractor refers to any third-party contractor hired by Rullion directly to undertake tasks associated with, but not limited to the maintenance, refurbishment or re-fit of Rullion premises.

Prior to any contractor being appointed to conduct work at Rullion's premises, each contractor must be evaluated to ensure that they meet the Company's health and safety requirements as well as being able to provide a satisfactory service.

Prior to appointment, contractors must provide Rullion with copies of the following information:

- Public liability insurance
- Employers' liability
- References from similar work
- Proof of competence to undertake the work
- Risk assessments/method statements for the work to be undertaken

The above documentation will be reviewed by the Business Services Manager / Health and Safety Representatives in conjunction with the Manager responsible for SHE.

Rullion safety rules will be issued to all contractors and will be clearly stated in contractual arrangements, together with any special health and safety requirements likely to affect cost or timescales.

The Company will make arrangements for the exchange of all relevant information arising from risk assessments and emergency procedures, particularly steps required to protect contractors' employees from other contractors and their employees, as well as the day-to-day activities of Rullion's employees and workplace.

If in doubt, local management must contact the Manager responsible for SHE for advice and assistance.

Where satisfactory levels of H&S compliance cannot be demonstrated by contractors, work will not be permitted to commence.

On discovery of any unsafe working practice being undertaken by the contractor, they may be asked to cease work immediately and remedy the situation prior to recommencement of the task.

16.2 Equipment

Plant and equipment, such as temporary access platforms, ladders, personal protective equipment, lifting equipment, internal transport vehicles and electrical equipment, will not be loaned to contractors unless exceptional circumstances prevent contractors from using or hiring their own. Even in these circumstances, contractors will only be permitted to use such equipment with written authority to do so for a specified task and period, provided the equipment is in a sound condition and the contractor is competent to use it.

All plant and equipment provided by contractors must be satisfactorily maintained and in a good condition. Portable electrical appliances must be PAT tested and where possible battery-operated equipment is preferred.

Where work above ground level is required, ladders must not be used at Rullion premises, unless the work is of short duration and there is no suitable alternative, due to limitations of space or other safety consideration.

16.3 Co-ordination

A competent, named individual will be appointed to co-ordinate each contract on behalf of Rullion, including at least daily site visits and out-of-normal-hours communications. This individual will be expected to encourage and develop the right safety culture amongst contractors.

16.4 Reporting

All employees will be expected to report danger (within their capability to recognise unsafe practices) to their manager or supervisor, who will be expected to either:

- stop the work if serious or imminent danger to persons or property, is foreseen

Or where there is not a serious or imminent danger to

- notify the department or individual responsible for co-ordinating the work by telephone or by email, depending on the circumstances, so that appropriate investigations and remedial action can be taken

Where construction work is carried out, such reporting and consultation will be in accordance with the principal contractor's health and safety plan or site rules, as appointed by Rullion.

16.5 Construction Work That Falls Within the Scope of the Construction (Design and Management) Regulations 2015 (as amended)

Where any construction work is carried out at Rullion premises that is subject to the Construction (Design and Management) Regulations 2015, the Company will appoint, at the appropriate time, a planning supervisor and principal contractor for each project. It will ensure that those they appoint are competent and have adequate resources available to carry out their duties competently.

The Company will ensure that no construction commences until an adequate health and safety plan covering the work has been prepared.

The Company will ensure that any health and safety file, prepared in relation to any project, is kept readily available for inspection and that when any such file is handed over to a third party, the necessary steps are taken so that the party understands the purpose and nature of the file.

SECTION 17. SMOKING AT WORK

17.1 Introduction

This policy is intended to ensure that all staff and visitors to Rullion premises benefit from a smoke-free environment.

Any concerns employees may have regarding smoking at work should be reported immediately to a Health and Safety Representative or the Manager responsible for SHE so that corrective action can be taken if necessary.

17.2 Responsibilities

Location Managers:

Location Managers are responsible for ensuring that there are:

- Arrangements for designated smoking areas
- No Smoking signs and illustrations of smoking areas are clearly displayed in branches
- Arrangements are made for smoking breaks for employees

17.3 Arrangements

Rullion takes the view that smoking constitutes a fire risk and a hazard to the health of all employees, both smokers and non-smokers (as a result of “passive smoking”).

Rullion offices have been designated as smoke-free environments. Smoking will not be permitted in any premises, grounds or in vehicles. This restriction applies at all times, including outside normal working hours.

For the avoidance of doubt the term ‘vehicle’ refers to any company owned vehicle or employee vehicle funded by a company car allowance, which may be used for the purposes of business by:

- More than one person at any one time i.e., car sharing with other employees/transporting workers or clients etc.
- More than one person at different times i.e., a pool car

Where the vehicle will only be used by one employee and no other work-related person, the vehicle will not be classed as a workplace or a public space.

All visitors, temporary staff, contractors and clients will be expected to abide by the terms of the smoking policy. Appropriate signs are displayed at all entrances to the premises and employees should tactfully remind visitors of the policy, if necessary.

Anyone wishing to smoke may do so in designated smoking areas: these will be illustrated in each Location. Smokers may use these facilities as agreed with their line manager.

Any employee who ignores or abuses the smoking policy will be treated in accordance with the Company's disciplinary procedure and, in the case of repeated offences, may be dismissed from the Company's employ.

17.4 Temporary Workers/Contractors

Temporary Workers/contractors assigned to work at Client premises through Rullion's employment business, will be bound by the smoking arrangements invoked at the Clients' premises.

SECTION 18. MOBILE PHONES

18.1 Introduction

This policy is designed to cover Rullion's rules for the safe and sensible use of mobile phones within the business, both in the working environment generally and in particular whilst employees are driving motor vehicles.

18.2 Definitions

For the avoidance of doubt, the term 'mobile phones' means - Any **handheld** device interactively used for accessing data, sending/receiving text or email messages and images and for making/receiving telephone calls.

18.3 Responsibilities

All staff are responsible for ensuring that they comply with the Company policy.

18.4 Legislation

It is illegal to use a handheld device in a motor vehicle whilst the engine is switched on.

It is not illegal to use mobile phones whilst driving provided the device can be operated without it being held in the driver's hand at any time and provided appropriate hands-free kits are used.

18.5 Policy

Mobile Phones in Vehicles

The use of mobile phones is strictly prohibited in business vehicles or any other vehicle (suitably insured) on Company business whilst the engine is switched on. Mobile phones should preferably be switched off and diverted to voicemail, a messaging service or an alternative number (either the office or another colleague), whilst in transit.

If mobile phones are left switched on whilst travelling, they should be diverted to voicemail/messaging service or must remain unanswered until the vehicle has been parked safely and the engine switched off, at which time messages can be collected and calls returned accordingly.

If there is a passenger in the vehicle the passenger may answer a mobile phone call whilst the vehicle is moving. It is not acceptable to use a mobile phone whilst stationary at traffic lights or in any other traffic jam. Whilst the employee is in a vehicle on Company business, mobile phones may only be used when the vehicle is parked safely and the engine is turned off.

Hands Free Equipment

Some Company and personal vehicles may be fitted with hands free equipment, and although it is not illegal to use mobile equipment with proper hands free facilities, Rullion adheres to the principles of the Highway Code and does not condone the use of this equipment whilst the vehicle is in motion. Any driver that uses the hands free equipment whilst the engine is switched on should be aware that they may still be prosecuted for using hands free equipment if they fail to demonstrate proper control of the vehicle.

Motorway Driving

It is prohibited to pull up on the hard shoulder to use a mobile phone unless there is an emergency - a ringing mobile phone is not classified as an emergency. Mobile phones may be used on the hard shoulder in the event of an emergency i.e. accident, breakdown, ill health. Please ensure the engine is switched off. Mobile phones may be used on the motorway whilst in transit, **ONLY** if there is an emergency and it is unsafe or impractical to stop. In this instance calls should be 999 or 112 calls only.



Regular Breaks whilst in Transit

The Board of Directors does not want to inhibit Rullion business by limiting the use of mobile phones. Consequently, Rullion encourages employees to stop on a regular basis (at least 15 minutes in every 2 hours) firstly to take a break from driving in line with guidance for driver safety but also to answer messages, make and take calls and communicate as required for the benefit of the business.

18.6 The Use of Mobile Phones in the Rullion Business

Mobile phones are valuable business tools and should be used sensibly, but not excessively, to the advantage of the business. For guidance on health issues surrounding mobile phones please refer to the section on 'health issues' below.

Mobile phones for the purposes of business may be used in the office environment, subject to the approval and local arrangements instigated by the respective Managing Directors and/or Location Managers.

Mobile phones, whilst in meetings or whilst visiting clients' premises should be switched off or set to 'silent' as a matter of courtesy.

18.7 Health Issues

Mobile phones emit and receive radio waves. Radio waves can damage health. Current research shows that exposure to radio waves can cause changes in brain activity although it is not clear why this occurs.

SECTION 19. SUBSTANCE ABUSE

19.1 Introduction:

Legislation requires the Company to ensure, as far as is reasonably practicable, the health and safety of its employees and non-employees at work. This document reflects Rullion Staff engaged on Employment contracts and Temporary Workers engaged on Contracts for Services/Terms of Business respectively.

It is not Rullion's policy to intrude on the privacy of individuals, particularly in relation to health matters where their condition does not affect their conduct or performance. The Company must however be concerned where health or behaviour impairs the conduct of work or impinges on the health and safety of the individual and /or others. Rullion recognises that substance abuse can cause such impairment.

Rullion also appreciates that different approaches are required in individual circumstances to reflect the different legal positions on the possession and supply of drugs. Rullion has a legal duty to report instances of illegal drug abuse and consequently any instance involving possession or dealing in drugs in the workplace will be reported immediately to the police.

19.2 Definitions:

For the avoidance of doubt, and for the purposes of this policy, 'Substance Abuse' is defined as:

'Irresponsible or habitual use of any substance, legal or illegal, other than prescribed medication used in accordance with directions from a medical practitioner and with the knowledge of the business, causing any person to be derelict in the performance of their duties or where attendance at work is interfered with, or where a person endangers the safety of themselves and/or others.'

Substances of abuse: this includes but is not limited to:

Heroin, cannabis and related drugs, opiates, cocaine and "crack cocaine", amphetamines, ecstasy, barbiturates, tranquilizers (benzodiazepines), LSD, and other hallucinogens, anabolic steroids, poppers (alkyl nitrates), solvents, some plant material such as magic mushrooms, some herbal cigarettes. The consumption of any form of alcohol. Prescription drugs that are not used in accordance with instructions from a medical practitioner or where prescribed medication is being taken that could affect a person's normal activities and the employee/temporary worker has not informed the business accordingly.

Drugs and alcohol testing: for the purpose of this document, this means testing to identify whether or not drugs or alcohol are present in a relevant person.

'For cause' Drugs and Alcohol Testing: is testing to identify whether drugs or alcohol are present in a relevant person where there are reasonable grounds to suspect that the fitness of that person:

- Has contributed to, or is likely to have contributed to, the cause of an incident or accident
- Is likely to compromise the safety of the relevant person or others

Incident: unplanned, uncontrolled event which could have resulted, but did not result, in death, ill health, injury or other loss.

Safety Critical Operations: for the purpose of this document means any high-risk activity or workplace that could result in the serious injury or death of an individual or group of individuals and where rigorous safety management and accountability is required.

In relation to temporary workers placed in the Rail Industry this meaning has the definition as assigned in the Railways (Safety Critical Work) Regulations 1994

Positive Result: means that testing for drugs and alcohol shows:

- The presence of drugs for which there is no legitimate medical need for either their use or the quantity of their use



- For all persons other than those working in the rail industry; more than the UK legal limit of alcohol in the blood, urine or breath as determined by the limits set in current legislation from time to time
- For Temporary Workers supplied to the rail industry; more than the limits quoted at any time in the Railway Group Standard GE/RT 8070

19.3 Legislation:

Rullion as employers have responsibilities in relation to substance abuse at work, under the following key legislation:

- Health and Safety at Work Act 1974
- The Management of Health and Safety Regulations 1999
- Misuse of Drugs Act 1971
- Drugs Act 2005
- Road Traffic Act 1991
- Transport & Works Act 1992

19.4 Responsibilities – Relating to Rullion Employees

Managers

If a Manager becomes aware of drug, alcohol or substance abuse problems in an employee, they should invite the employee for a confidential interview, involving the HR Department. Notes should be taken to record concern for the health and possible predicament of the employee and to highlight the support available. The Manager should urge the employee to seek help as soon as possible. **(See Appendix B for management guidance).**

Staff

Individuals who know or suspect that they have a substance abuse related problem are encouraged to seek help voluntarily. Their General Practitioner or local voluntary agencies are the most suitable contacts.

It is possible that an employee with a substance abuse related problem will come to the attention of colleagues through indications of inadequate or deteriorating work performance or through changes in personality and/or behaviour. It is in the interest of the employee with substance abuse problems to be offered early assistance, as prompt action increases successful treatment.

General Guidelines for Rullion Employees

Any employee who believes that they may have drug or alcohol dependence or a substance abuse problem, is encouraged to seek help and advice from their General Practitioner. If the company believes that an employee has a substance abuse problem, it may require that employee to attend an interview with their Manager in the first instance.

The Manager will then provide a report to the HR/SHE Department on the employee's condition and their suitability to fulfil their responsibilities.

If it is shown that the working environment is contributing to a substance abuse problem the Company will take reasonable steps to address the situation and the HR/SHE Department will work in collaboration with the Manager to this end.

The Company will respect at all times the need for confidentiality in relation to any issues raised.

It is hoped that any employee who believes that a colleague has a substance abuse problem will encourage him/her to seek professional help.

Someone whose substance abuse problem has come to the attention of a Manager will, in the first place, be encouraged to discuss the problem and, if appropriate, be advised to seek medical



assistance. The Company will regard anyone seeking help as having a health problem and will cooperate so as to enable appropriate help/treatment to be obtained.

The Company will treat reasonable absences for advice and treatment for substance abuse as sick leave within the bounds of the Company Absence Policy provided that employee regularly informs the Company of progress and genuinely attempts to overcome the substance abuse problem.

If an employee's performance/behaviour at work is suffering, this would normally result in disciplinary action being taken. Such action will be suspended for an appropriate period during treatment if the reason for this is due to substance abuse issues.

Should help be refused by an employee, or if treatment is discontinued or, after a reasonable interval there is no improvement in behaviour, and/or work performance remains poor, disciplinary procedures will be resumed or initiated. Such procedures may result in the termination of an employee's contract of employment. In these cases, the Company's disciplinary procedures will be followed.

If, because of substance abuse, or for any other reason, an employee behaves or carries out their work in such a way as to endanger themselves or others, the Company will take prompt corrective action as necessary, to prevent accidents or incidents occurring. In this situation the employee's substance abuse will be taken into account, but it may not necessarily free them from the consequences of their conduct.

In rare cases an employee who develops a substance abuse problem may become unsuited to a particular post. Consideration will need to be given to the role of such an employee and, wherever possible, a suitable alternative sought.

Agreement to accept treatment for substance abuse will not in itself be detrimental to an employee's general conditions of service.

Alcohol at Work

The consumption of alcohol during working hours or whilst undertaking Company business will only be permitted as follows:

On special occasions, such as visitor's receptions, open days, presentations or seasonal gatherings and then only if:

- Prior written permission is obtained from the relevant Executive Director of the Company
- On such occasions, the provision of alcohol will be moderate and suitable non-alcoholic alternatives must be made available
- The consumption of alcohol at any other time is prohibited during working hours

The consumption of alcohol, out of working hours at Company celebrations i.e. incentive dinners, Christmas celebrations, etc. will only be permitted as follows:

- On such occasions the provision of alcohol by the Company will be moderate and non-alcoholic alternatives will be made available
- If employees have consumed alcohol, transport or suitable overnight accommodation will be made available (as appropriate) however the cost for this may be chargeable to the employee unless there is prior specific agreement from the Managing Director of the relevant company

Any employee who does drink alcohol in either of the scenarios detailed above, must not drive after the event until suitable time has elapsed to ensure that the employee is not under the influence of alcohol.

Being incapacitated due to alcohol at work or whilst representing Rullion out of working hours, and/or any resulting unacceptable conduct, will be treated as gross misconduct and any serious or repeated abuse will lead to dismissal.



Driving a vehicle whilst under the influence of alcohol is strictly prohibited and will be treated as gross misconduct, which may lead to dismissal. Employees should remember that the effects of heavy drinking at night could last well into the next day.

Misuse or Dealing in Illegal Drugs/Solvents at Work

Any employee who is involved with the misuse or dealing in drugs/solvents at work will be disciplined and any serious or repeated abuse will lead to dismissal.

Driving a vehicle whilst under the influence of behavioural changing drugs/solvents is strictly prohibited and will be treated as gross misconduct, which may lead to dismissal.

Drugs and Alcohol Testing.

It is not Rullion's policy to undertake random or regular testing for employees. In the Rullion business (recruitment), employees do not generally undertake safety critical operations, nor operate heavy machinery, nor do they generally work in high-risk environments, therefore Rullion does not believe there is a valid business or safety benefit to justify testing. However, if Rullion believes that an employee is involved in substance abuse and/or that there is a risk to the health and safety of the individual or other employees as a result of suspected substance abuse, Rullion reserves the right to request the employee to undertake relevant 'For Cause' drugs and alcohol testing. Should an employee refuse and the Company genuinely believe that there is a substance abuse issue, then disciplinary action may be taken as required.

Rullion may also request testing for specific circumstances, for example:

- Should an employee be required to work in a high risk or safety critical environment whilst undertaking their duties
- Should a Rullion employee be required to work at a Client's site where testing is a Client specified requirement for safety reasons
- As part of an accident investigation where substance abuse is suspected as a contributory cause
- As a follow up check as part of aftercare or a rehabilitation process following substance abuse treatment
- Where legislation demands that testing is undertaken

Testing will only be requested if there is a genuine business need. Employees will always be consulted, and consent requested in writing.

Testing will always be undertaken by a UKAS accredited laboratory that meets all the security, accuracy and confidentiality criteria for providing drug-screening results.

Prescription Drugs.

The Company recognises that employees may, on occasions, use prescribed or over-the-counter medicines, which may cause impairment to an individual's performance at work. Individuals are required to discuss this with their Line Manager who will inform HR and the Manager responsible for SHE to obtain advice in relation to any appropriate and/or necessary work restrictions during the period that the medication is being administered.

19.5 Responsibilities - Relating to Temporary Workers.

Actions by Managers and Location Staff – If a Rullion Manager or member of staff becomes aware of drug, alcohol or substance abuse problems of a temporary worker, they should invite the worker for a confidential interview. Notes should be taken to record concern for the health and possible predicament of the temporary worker and to highlight the support available.



The Manager or member of staff should urge the temporary worker to seek help as soon as possible.

It must be made clear to temporary workers that when being considered for work their safety and that of others must be taken into consideration.

Workers who are known to have substance abuse problems must not be placed on assignments.

Should a substance abuse problem be identified whilst a temporary worker is on a placement, it is imperative to inform clients to ensure that this does not breach their policies and procedures, so that they are aware of any potential risks, and to ensure that the temporary worker is not asked to undertake work that may endanger the safety of themselves or others on site. Written permission must be obtained from the temporary worker to inform clients accordingly. Should permission be refused, the temporary worker must be removed from the assignment in the interests of safety. Clients do have the right to request that the temporary worker be removed from site in accordance with their policies and procedures.

Ltd Co. Temporary Workers – The temporary worker must be encouraged to inform their employers at the earliest opportunity about any substance abuse problem.

Action by Individuals (Temporary workers) - It is the responsibility of every individual to ensure that they comply with the policies in place at the Client sites where they are placed for work. Individuals who know or suspect that they have a substance abuse related problem should inform the Client in the first instance and Rullion (and in the case of Ltd Co Workers, their employers) at the earliest opportunity and are encouraged to seek help voluntarily. The General Practitioner or local voluntary agencies are the most suitable contacts.

Action by Colleagues – It is possible that a temporary worker with a substance abuse related problem will come to the attention of colleagues through indications of inadequate or deteriorating work performance or changes in personality and/or behaviour. It is in the interest of the temporary worker with substance abuse problems to be offered early assistance, as prompt action increases successful treatment.

The first approach should be for colleagues to encourage the temporary worker to recognise their problem and to seek advice, either through their General Practitioner or specialist agencies. If this fails, colleagues are encouraged to alert both their Manager at the client site and Rullion to the situation.

Reluctance by colleagues to undertake this approach is understandable. However, past experience suggests that covering for a neglect of duties serves only to delay or prevent a successful outcome.

Action by Clients - Temporary Workers are placed with Clients under their supervision, direction and control. All temporary workers must therefore adhere to all Client policies including substance abuse. It is the Client's responsibility to notify Rullion if it believes that a temporary worker supplied by Rullion has a substance abuse problem and to advise Rullion of the action being taken in accordance with the Clients Policy.

If the Client does not wish for the temporary worker to continue in the placement, the Client must inform Rullion in writing accordingly and Rullion will arrange the candidate's removal and a replacement candidate.

General Guidelines For Temporary Workers

Any temporary worker who believes that they may have drug or alcohol dependence or a substance abuse problem, is encouraged to seek help and advice from their General Practitioner. If Rullion believes that a temporary worker has a substance abuse problem, it may require that person to attend an interview with Rullion.



Rullion reserves the right to discontinue considering the temporary worker for placements and records will be removed from Rullion's database accordingly.

The Company will respect at all times the need for confidentiality in relation to any issues raised.

Where a temporary worker is employed by a Limited Company, Rullion reserves the right to inform the Ltd Company of any alleged substance abuse issues.

Alcohol at Work

Rullion's policy is that the consumption of alcohol whilst on assignment is strictly prohibited. Temporary workers must adhere to the policies and procedures in place at the host Client site where they are placed for work.

Rail Industry: The consumption of alcohol is prohibited at all times and alcohol testing will require workers to comply with the blood/urine/breath alcohol content as defined in the railway Group Standard GE/RT8070, which is lower than the limits otherwise used in the UK.

Misuse or Dealing in Illegal Drugs/Solvents at Work

Any temporary worker who is involved with the misuse or dealing in illegal drugs/solvents whilst on assignment with a Client will not be considered for further placements through Rullion, and in accordance with current legislation a report will be made to the Police.

Testing for Alcohol or Drugs.

Testing for Alcohol or Drugs would only be undertaken for temporary workers at the request of a host Client where there is a legal or safety requirement in accordance with their policies and procedures.

Should a Client require pre-work testing, random testing or for cause testing, permission will be obtained from the temporary worker prior to placement and any testing undertaken would be the responsibility of the Client, in consultation with the temporary worker.

Rail Industry: Any worker placed into the rail industry must agree to comply with the Policies, procedures and legislation specifically in place for this industry. This will include rules and procedures relating to drugs and alcohol.

Prescription Drugs.

Rullion recognises that temporary workers may, on occasions, use prescribed or over-the-counter medicines, which may cause impairment to an individual's performance at work. Individuals are required to discuss this with their Line Manager at the host Client's site and to inform Rullion accordingly so that appropriate arrangements can be made for any necessary work restrictions whilst medication is being taken. In some cases, it may be necessary to consider an alternative placement.

Rail Industry - Temporary workers must inform Rullion and the Client regarding ANY prescription or over the counter medicines that are being used. Prior to any work being undertaken, the Client will refer for advice to a competent medical authority on the likely effects of the medication and evaluate the ability of the person to undertake the works. This could result in the temporary worker being unable to continue the work until medication is ceased or substituted with an alternative that will not affect their work.

Appendix A - Commonly Misused Substances in the UK*

Name	How Taken	Effects Sought	Harmful effects Include:	Legal Class
Heroin (smack, gear, H, junk, horse, scag etc.)	Injected snorted or smoked	Drowsiness, sense of warmth / well being	Physical dependence, tolerance. Overdose can lead to coma and even death. Sharing equipment risks HIV or hepatitis infection	A
Cocaine (coke, Charlie, snow, C)	Snorted in powder form, injected.	Sense of well-being, alertness, confidence	Dependence, restlessness, paranoia, damage to nasal membranes	A
Crack (freebase, rock wash, stone)	Smokable form of cocaine	As for cocaine but initial feelings more intense	As for cocaine but because of intensity, crack use can be very hard to control, damage to lungs	A
Ecstasy (E, XTC, doves, disco biscuits, echoes, Scooby doos)	Swallowed - usually in a tablet	Alert, energetic but with a sense of calmness and well-being toward others. Heightened sense of sound and colour	Possible nausea and panic, overheating and dehydration if dancing which can be fatal. Use has been linked to liver and kidney problems, Long term effects not clear but could include mental illness and depression	A
LSD (acid, trips, tabs, dots, blotters, microdots)	Swallowed on a tiny square of paper	Hallucinations including distorted or mixed-up sense of vision, hearing & time. Trip can last 8/12 hours	There is no way of stopping a bad trip, which may be a very frightening experience. Increased risk of accidents can trigger off long-term mental problems	A
Magic Mushrooms (shrooms, mushies)	Eaten raw or dried, cooked in food or brewed in tea	Similar effects to LSD but trip often milder & shorter	As for LSD with additional risk of sickness and poisoning	A
Cannabis (hash, dope, grass, blow, ganja, weed, puff marijuana)	Smoked: Rolled with tobacco into a spliff, joint or reefer. In a pipe or eaten.	Relaxed, talkative state, heightened sense of sound and colour	Impaired co-ordination and increased risk of accidents, poor concentration, anxiety, depression, increased risk of respiratory diseases inc. lung cancer	B
Barbiturates (barbs, downers)	Swallowed as tablets or capsules. Injected ampules	Calm & relaxed, larger doses produce a drunken effect	Dependency and tolerance, overdose can lead to coma or even death. Severe withdrawal symptoms	B
Amphetamines (speed, whiz, uppers, billy, sulph, amp)	In powder form dissolved in drinks, injected, sniffed or snorted	Stimulates the nervous system, wakefulness, feeling of energy & confidence	Insomnia, mood swings, irritability, panic. The comedown can be severe and last for several days	B

Name	How Taken	Effects Sought	Harmful effects Include:	Legal Class
Tranquillizers (Temazepam Valium, Mogadon, etc.)	Swallowed as tablets or capsules, injected	Prescribed for relief of anxiety & to treat insomnia, high doses cause drowsiness	Dependency and tolerance, increased risk of accidents, overdose can be fatal, severe withdrawal symptoms.	C – Available only on prescription these are legal
Anabolic Steroids (various trade names)	Injected or swallowed as tablets	With exercise can help to build up muscle. There is some debate about whether drug improves muscles power and athletic performance	Men: erection problems, risk of heart attack or liver problems. Women: development of male characteristics. Injecting equipment brings risk of HIV or hepatitis.	C
Poppers (alkyl nitrates, inc. amyl nitrate or TNT or Thrust)	Vapours from small bottle of liquid are breathed in through mouth or nose	Brief and intense head-rush caused by sudden surge of blood through the brain	Nausea, headaches, fainting, loss of balance, skin problems around the mouth and nose, particularly dangerous for those with glaucoma, anaemia breathing or heart problems	Not illegal to possess but to supply without prescription is illegal
Solvents (lighter gas refills, aerosols, glues, paint thinners, correcting fluids)	Sniffed or breathed into the lungs	Short-lived effects similar to being drunk, thick- headed, dizziness, possible hallucinations	Nausea, blackouts, increased risk of accident. Fatal heart problems can cause instant death	Not illegal to possess but it is illegal for a shopkeeper to sell solvents to anyone under 18 if they suspect they are intended for misuse

APPENDIX B – MANAGEMENT GUIDANCE *

Signs of drug misuse, which you might look for include:

- Sudden mood changes
- Unusual irritability or aggression
- A tendency to become confused
- Abnormal fluctuations in concentration and energy
- Impaired job performance
- Poor timekeeping
- Increased short-term sickness absence
- A deterioration in relationships with colleagues, customers or management
- Dishonesty and theft (arising from the need to maintain an expensive habit)
- Change in pallor, skin tones and eyes.
- Skin lesions or bruising/markings to arms

Signs of Alcohol Misuse, which you might look for include:

- Lateness
- Increased short-term absenteeism - Observe any patterns
- Impaired or deteriorating job performance
- Smell of alcohol
- Increased accidents
- Impaired judgement
- Inability to concentrate
- Impaired physical co-ordination

SECTION 20. EYE TESTS

20.1 Introduction

It is a Health and Safety requirement of all employers to ensure that work equipment provided is suitable for the purpose and conditions for which it is used. Additionally, in accordance with Regulation 5 of the Health and Safety (Display Screen Equipment) Regulations 1992, as amended, employers are required to provide eye tests and appropriate special corrective appliances only where appropriate.

20.2 Definitions

Display Screen Equipment (DSE) – Any equipment with an alpha numeric or graphic display regardless of the display process involved.

User – Any person using DSE regularly as a significant part of their normal work. Rullion has considered the work undertaken by its employees and has established defined criteria to identify those employees who would be classified as a user under current legislation, and this is published on the Intranet. User status will be determined following a risk assessment.

Special Corrective Appliance – An appliance (normally spectacles) prescribed to correct vision defects specifically related to DSE work. This does not include normal appliances, which correct any other visual defects not associated with DSE use.

20.3 Responsibilities

Health and Safety Reps, Business Services and the Manager responsible for SHE

Shall undertake all risk assessments and training in relation to DSE and workstation use and make recommendations accordingly.

Managers

It is Managers' responsibility to ensure that staff are aware of the eye test policy and also to inform Business Services about any employee who has requested and is attending an eye test. Managers must notify the Manager responsible for SHE and/or Health and Safety Representatives about any employee experiencing visual or physical problems whilst using DSE.

Business Services – will manage the eye test voucher information sent to them in relation to Company charges.

Staff – It is each person's responsibility to request an eye test if required and to notify Rullion about any visual issues relating to the use of DSE.

20.4 Arrangements

Where an employee is classified as a user of DSE following a risk assessment, Rullion will pay for an eye test with Specsavers Opticians through the Corporate Eyecare Scheme. Rullion will not pay for eye tests from any other provider.

Rullion will pay for an eye test in the following circumstances:

- Every 2 years
- As often as required if a registered Ophthalmic Optician or Doctor have confirmed in writing that more regular tests are required specifically for DSE purposes
- When someone who has not been classified as a user, becomes a user
- Where a DSE user experiences visual difficulty that may be reasonably considered to be caused by work associated with the use of DSE
- If there are any other relevant circumstances



Eye tests are optional and will only be undertaken at the request or following consent of the employee.

Rullion will make no payment towards other treatment arising from an eye-test, as the National Health Service facilitates this.

Should you have any enquiries please contact Business Services or the HR department for advice.

20.4.1 Arrangements for Employees in Scotland

The Scottish Executive has implemented free eye tests in Scotland in an endeavour to address avoidable blindness.

Employees in Scotland will therefore be eligible for a free eye test on the NHS and will not require an eye test paid for by the Company.

20.5 Corporate Eye Care Scheme:

Employees should request a VDU Eye Care Voucher from Business Services by email.

- A voucher will be sent to the employee by internal mail normally within 24 hours
- Employees should book an eye test at their local Specsavers opticians - Details regarding branch locations can be obtained from the Manager responsible for SHE or the Specsavers website - www.specscavers.co.uk
- Employees should take their allocated voucher to Specsavers when attending for an eye test

The voucher will entitle employees to the following:

- An eye test (with no cost to the employee)
- Special Corrective Appliances for VDU use, where prescribed, from the £45 range of glasses. Employees may choose spectacles from any of the Specsavers ranges however any cost over the specified £45 will be the responsibility of the employee
- £20 off any other purchase of spectacles from the £99 and above range for general prescriptions

20.5.1 Vouchers for Employees in Scotland

If an employee in Scotland has an eye test and is deemed to require special corrective appliances the following process should be followed to facilitate payment of these by the Company:

- Employees should request a VDU Eyecare Voucher from Business Services by e-mail
- A voucher will be sent to the employee by internal mail normally within 24 hours
- Employees should take their allocated voucher to any branch of Specsavers, together with their current prescription and a confirmation from their Optician that the prescription is for DSE use only

Employees will then be eligible for Special Corrective Appliances from the £45 range of glasses. Employees may choose spectacles from any of the Specsavers ranges however any cost over the specified £45 will be the responsibility of the employee.

Where an Employee requires a general prescription for any other spectacles – the employee has the choice of:

- Purchasing spectacles as normal from their preferred Optician; or
- Applying for a VDU Eyecare Voucher, as described above, and submitting this at any Specsavers Branch to obtain £20 off any purchase of spectacles from the £99 and above range for general prescriptions

20.6 Arrangements for Temporary Workers



PAYE Temporary Workers are placed on a contract for service and not an employment contract. In accordance with their terms of engagement they are self-employed and therefore Rullion would not normally cover the cost of a sight test.

In some circumstances where a temporary worker has been placed frequently by Rullion on short term assignments with a variety of clients over a number of years, MDs may decide at their discretion, to cover the cost of an eyesight test because of the long- standing relationship between Rullion and the worker.

Where a temporary worker has been placed with a single client for a number of years, the client may decide to cover the cost of the eye test. The relationship would be more applicable to the client in this instance because they have supervision, direction and control over the working environment, the work undertaken and the equipment supplied.

Limited Company Workers - Rullion would not cover the cost of an eye test for a Limited Company Worker, because they are employees of their Limited Company and not Rullion. In this instance the cost of eye test would be the responsibility of the Limited Company concerned.

SECTION 21. LONE WORKING ARRANGEMENTS

21.1 Responsibilities

Managers are responsible for ensuring that any staff they allow to work alone receive the necessary risk assessment, and any corrective, precautionary conditions placed upon the individual as a result of the risk assessment are implemented. Managers are also responsible for seeking guidance and advice from the Manager responsible for SHE on any point relating to health concerns for individuals proposing to work alone.

Health and Safety Representatives and Business Services are responsible for providing information and support to Management and staff relating to lone working arrangements, undertaking risk assessments/audits and reporting any breaches and recommendations for change to Management.

21.2 Arrangements

General Arrangements for Lone Workers:

In general the work undertaken by Rullion employees should be no more dangerous out of hours than within normal working hours. Staff should not undertake any task whilst working alone that they would not normally undertake when they are not working alone. The following points offer guidance to staff and managers:

- A lone working assessment must be undertaken prior to any member of staff planning to work alone. This will identify whether there are any health or other concerns relating to the task being undertaken
- Never work alone in the office, there should be a minimum of 2 people present at all times. When entering or leaving the office the first or last 2 people should enter or leave together
- Ensure you are aware of how to summon help in the event of an emergency and that you know where emergency supplies are located such as the first aid box and fire extinguishers etc.
- Ensure you have means of communication – i.e. access to a telephone or mobile phone
- Make sure you have emergency contact numbers to hand:
 - Telephone number of the office or a colleague
 - Telephone number of a member of your family i.e. spouse, partner, parent etc.
 - Your Doctor or the NHS helpline
 - The Emergency Services
 - The Local Hospital
- Make sure you provide the office with a contact telephone number for you if you are working off-site
- If you will be working off-site, or visiting a client or other's premises, ensure your Manager knows where you are going and provide an estimated time of return
- Prior to returning to the office from an offsite visit, ring your manager or colleague with an estimated arrival time so it is clear you are in transit. Stay in contact if you are delayed
- If you have been offsite and are not returning to the office, make sure your manager is aware of this and knows where you are going – even if this is home
- Where possible female workers should leave the office in pairs after dark
- In vulnerable locations where safety may be an issue, all employees should endeavour to leave in pairs
- Wherever you are working always ensure that there is a safe way in and out of the building and that you are familiar with the means of escape in an emergency
- If you are visiting other premises, always ensure you understand their arrangements for:
 - Fire
 - First Aid
 - Welfare facilities
- Young persons must be supervised at all times and must not work alone.
- Ideally Manual Handling activities should be avoided whilst working alone, however if this is not possible ensure:



- You are able to lift the load safely – Ensure you have sufficient space; you are able to grip the load securely and you bend your knees and keep your back straight. Where possible avoid lifting and use a trolley
- Avoid awkward pulling pushing or reaching actions
- Avoid twisting and stooping

In the event an individual is unavoidably alone in a Rullion office the following precautions must be taken:

- Ensure there is a list of emergency contact numbers on the notice board for easy access
- Ensure that someone (a colleague, friend or relative) is aware that you are attending the office and your anticipated length of stay
- Call this person on arrival and prior to leaving so that you can be accounted for
- Ensure you have access to a mobile phone and carry this with you at all times

SECTION 22. HOMEWORKING

22.1 General Statement

Rullion encourages its staff to work at home. In this context, such employees are referred to as Occasional Homeworkers. Rullion will supply or support the purchase of equipment to enable the individual to work from home where this equipment is required for carrying out tasks. Rullion will not be responsible for any associated costs of working from home. More information is provided in the policy Virtual Working and Remote Working Policy Guide.

The implementation of this policy requires the total co-operation of all members of management and staff. There will be full consultation with employee representatives through existing channels of communication.

This procedure provides guidance to employees who may work from home, and to managers of such individuals.

Individuals must seek the permission of their line manager/managing director prior to working at home, when their attendance would normally be expected within an office.

22.2 Responsibilities

Line managers are responsible for approving homeworking and for ensuring homeworkers receive the appropriate training and information.

Employees are responsible for:

- their own health, safety and welfare and that of others affected by their work whilst working at home
- reporting any problems (including near misses) directly to their line manager
- following all training and instruction received
- ceasing work and reporting the problems to their line manager immediately, in the event that they are unable to follow training and instruction

22.3 Arrangements

The Company will in consultation with homeworkers:

- provide information, instruction, training and supervision
- ensure that all equipment provided for work is safe and regularly maintained

22.4 Information and Training

Suitable information and training will be provided to all homeworkers. Training needs will be identified and reviewed by a responsible person. Refresher training will also be given at reasonable intervals.

22.5 Good Practice Guidance for Homeworkers

Employees working from home should follow the guidance provided below:

- Ensure you have adequate and suitable light in the room where you are working
- Make sure the temperature is suitable – it is important to be comfortable
- Ensure you have a suitable table or desk where:
 - There is sufficient room to allow for you to work comfortably
 - There is adequate leg room
 - It is at a suitable height
- Ensure you have a suitable chair that:
 - Is comfortable
 - Provides suitable lumbar support
 - Is the correct height for the desk/table you are using and is preferably adjustable in height and tilt
- Make sure the PC equipment you are using is suitable for the job you are doing
- Always ensure electrical equipment is turned off and unplugged when not in use or before checking.
- You will visually check all PC equipment on a regular basis to ensure it is in good condition and fully operational:
 - Check that plugs are correctly wired and are not damaged
 - Check that there is no damage to the outside of the equipment i.e. no loose or missing parts
 - Check all cables and wires to ensure that there is no damage to the outer covering and no burn marks or stains that could indicate overheating
 - Check that your domestic electrical supply is suitable for the equipment you are operating

If you are in any doubt, please report any defects or faults with your computer equipment to the IS Helpdesk.

- Make sure you know how to operate your equipment correctly and safely
- Ensure that there are no trailing cables or exposed wires that could present a trip hazard for any members of your household, particularly children, the elderly or the disabled. Ensure cables are safely out of the way
- If you have any concerns relating to safety of your working environment at home, please contact the Manager responsible for SHE

SECTION 23. MOBILE WORKERS

23.1 Introduction

Rullion takes the health, safety and welfare of its staff seriously. It recognises that some staff will be working away from the main premises and are, as such, without close or direct supervision. The Company is committed to providing appropriate controls to all mobile workers to ensure that the risks to their health, safety and welfare are reduced, as far as is reasonably practicable, in accordance with the Health and Safety at Work, etc. Act 1974 and all other relevant legislation.

23.2 Definition

Mobile worker is someone whose contract states that they are required to work on, or travel between, a variety of workplaces or activities.

23.3 Responsibilities

Line managers have the day-to-day responsibility for mobile workers. They must ensure that:

- Mobile workers are aware of this policy and appropriate risk assessments are undertaken
- Suitable control measures are put into place to protect the safety of mobile workers

Mobile workers are responsible for:

- Their own health, safety and welfare and that of others affected by their work
- Co-operating with the organisation as regards their health, safety and welfare
- Reporting accidents and incidents (including near misses) immediately to their line manager, or to an appropriate person

Health and Safety Representatives/Business Services are responsible for:

- Ensuring risk assessments are carried out on activities involving mobile workers
- Reviewing risk assessments biannually, or when indications show a review is required

23.4 Provision of Workplace/Work Equipment

Only approved work equipment issued by the Company will be used in carrying out any work. All portable electrical equipment will be inspected and tested in accordance with the Company's Electrical Policy.

23.5 Training and Information

All mobile workers will receive relevant training and information in the activities to be performed, the risks faced and subsequent procedures such as first aid, accident reporting, etc. A commitment must be made to show that such training and information will be updated. An explanation of the arrangements for information about others' workplaces and equipment must also be included.

23.6 First Aid Provisions

Mobile workers must be made aware of the training required for first aid. Where appropriate, they may be provided with a first aid kit suitable for treating minor injuries.

Where personal first aid kits are issued, these must only be used to treat the injuries of the mobile worker and must not be used by the mobile worker to treat any other person, unless the mobile worker is a trained first aider with a current certificate.

23.7 Reporting of Incidents

Please refer to Section 6 of this policy "Accident and Incident Reporting and Investigation".

23.8 Communication

Mobile workers are largely detached from others while working. It is therefore imperative that a commitment is made to maintain regular communication with them. Provision should also be made to ensure that such communication is available at all times, especially if the mobile worker is required to work unsociable hours.

23.9 Time Management

Mobile workers must be made aware that support is available to them, regardless of whether they are required to work to a schedule, or if they have the discretion to manage their own workload. Similarly, if other aspects of their job are causing them problems, they should feel that they can report this and that they will receive relevant support.

Careful monitoring of mobile workers hours should be conducted to ensure that these comply with the Working Time Regulations or where the worker has opted out of the Regulations that working hours do not become excessive and a potential risk to health and safety.

23.10 Monitoring and Review

This policy will be monitored to ensure that it is functioning correctly and that the mobile workers are adequately protected. A review of the policy will be undertaken annually.

23.11 Guidance for Mobile Workers

Driving at Work:

- If you are driving long distances, ensure that you take a break at least every 2 hours
- If you are travelling with another colleague – share the driving (where the car will be insured for the 2nd driver and in the case of a Company Car, the 2nd driver has been approved for driving a Company vehicle)
- Where appropriate consider alternative modes of transport – train/plane etc. This may be a safer and more cost-effective mode of transport
- When travelling long distances incorporate these into your working day not on top of your working day – Tiredness kills!
- Consider staying in a hotel overnight if you have several meetings over a few days, away from the local area or where you have a full day's work off site and then have a long journey home
- If you suffer tiredness or feel unwell whilst driving – STOP. Take a rest and/or arrange for assistance. Only continue with your journey when you are fit to do so
- Ensure you have roadside assistance cover. If you breakdown call for assistance immediately and do not leave your vehicle unless it is unsafe to remain with it
- Make sure you have emergency contact numbers

Hotel Accommodation:

You should follow Rullion policy for booking hotels to ensure that suitable accommodation is selected.

- Make sure the accommodation is to a reasonable standard i.e., clean and secure
- Ensure the accommodation is well lit – externally and in public areas
- Be careful in your choice of location for accommodation – do not put yourself at risk
- Make sure you understand the fire and safety arrangements in place at your hotel and make sure that you adhere to these
- Do not smoke in no-smoking areas and bedrooms

SECTION 24. DISABLED WORKERS

It is the policy of this Company to treat all disabled employees and visitors with respect and dignity, both in the provision of a safe working environment and in equal access to the Company's facilities.

Regular risk assessments are undertaken of the special needs of the disabled and workplace tasks are amended in line with such assessments.

Employees with special needs are encouraged to make suggestions for any improvements to premises or tasks to their line managers.

Any employees found treating their disabled colleagues with less than the expected standards of respect and dignity will be liable to the first stage of the disciplinary procedure.

In a fire or bomb threat evacuation, employees are expected to help disabled people to leave the premises swiftly in accordance with local arrangements.

It is recognised that some manual tasks may be unsuitable for disabled employees and workplace tasks might need to be amended. In certain cases, a task could be moved to another person or appropriate assistance given.

For further guidance please refer to Rullion Equal Opportunities Policy.

Temporary Workers

Disabled temporary workers seeking work will be given the same opportunities as fully able candidates; however, consideration must be made to ensure that any disability is accommodated so it does not affect the safety and health of the individual or others in the workplace. The following arrangements will therefore apply:

- Disabilities will be recorded on Rullion's computer systems, together with any specific considerations that apply
- When placements arise, disabled workers will be considered equally to fully able candidates and will be selected based on their suitability for the role as specified by the Client
- Information relating to any disability will be communicated to the Client and Rullion will ensure that there are suitable facilities at Client sites to accommodate any special requirements prior to placement
- Where there are any specific risks relating to health and safety these will be clearly communicated to the temporary worker and the Client in writing

If a Client or Temporary Worker encounter any difficulties or unforeseen risks arising from a disability, they must communicate this to Rullion immediately so that appropriate arrangements may be made to ensure safety.

SECTION 25. YOUNG WORKERS

25.1 General Statement

While generic precautions taken to protect the health and safety of the workforce as a whole will, in many cases, also protect young persons there are occasions when different and/or additional measures will be necessary. This policy aims to reduce any identified risks to young persons and provide guidance on specific control measures required to protect them. This policy also acknowledges relevant legislative provisions and confirms Rullion's commitment to compliance with these provisions.

25.2 Responsibilities

Location Managers/Divisional and Regional Managers and Line Managers must ensure:

- Risk assessments are carried out for all work activities undertaken by young persons and associated records and documentation maintained
- Necessary control measures identified by the risk assessment are implemented, followed, monitored, reviewed and, if necessary, revised
- Young Persons are informed of any risks associated with their work and the control measures taken to protect them
- Copy of the risk assessment is provided to the parents or guardian of any children (16 or under) employed and that they are provided with written information about the work to be undertaken and permission is obtained for the child to work
- Any adverse incidents are immediately reported and investigated
- Appropriate information, instruction, supervision and training etc. is provided including the allocation of a specific mentor to oversee operations.

Young workers must:

- Follow any safety arrangements implemented for their protection, including attending training sessions, complying with control measures, etc.
- Not act in a manner that adversely affects their own health and safety, and/or the health and safety of anyone else
- Report any perceived, or real, shortcomings in protection levels to their employer.

25.3 Arrangements for Securing the Health and Safety of Young Workers

Elimination of Activities Hazardous to Young Workers

The Company will ensure that work activities exposing young persons to unacceptable risks are eliminated, so far as is reasonably practicable. Measures to achieve this include preventing exposure to such risks by ensuring relevant legal standards are met (dependent on the risk involved), and that official guidance and good practice is followed.

25.4 Assessment of Risk

Where hazardous activities cannot be eliminated, risk assessments to be carried out by the Manager responsible for SHE/H&S Reps will be undertaken to identify residual risks and to reduce them to the lowest level reasonably practicable. The assessments will take into account the actual risks associated with the work activities and whether or not these risks are increased due to the age of the young person. Risk assessments relating to young persons will be reviewed, and if necessary revised regularly.

25.5 Information and Training

Suitable information, instruction and training will be provided to young workers to ensure their health and safety. Training needs will be identified and reviewed by the mentor and line managers. The effectiveness of any training provided will be monitored and regularly reviewed to ensure its continued effectiveness.

Those people responsible for carrying out the risk assessments will be competent to do so.

25.6 Temporary Workers

Where young persons are considered for placement with a Client the following precautions must be taken:

- Clients must be informed of the age of the candidate and must agree in writing that they have suitable arrangements in place to manage young workers (see template letter on intranet)
- Rullion must obtain a copy of a Young Person's risk assessment for the role and this must be communicated to the Young Worker
- Consultants must ensure that the Client has adequate insurance in place for Young Workers
- Consultants must ensure that the Client appoints a specified person to supervise the activities of the Young Worker closely
- Consultants must ensure that the Young Worker will be provided with adequate training by the client and that they will not be asked to undertake any work for which they are not specifically trained
- In the event of any concerns regarding Health and Safety and the placement of a Young Worker, the Young Worker and/or Client must contact Rullion immediately so that appropriate arrangements can be made.

Rullion will not usually accept placements for children, due to the level of risks involved through a third party placement.

SECTION 26. PREGNANT WORKERS

26.1 Introduction

The aim of this document is to provide specific guidelines about Rullion's philosophy toward safe working practices for pregnant people. This is based on the general requirements of the H&S at Work Act 1974, The Management of H&S at Work Regulations 1999 and the EEC directives on Pregnant Workers, assessed in conjunction with the risks of the Rullion working environment (office-based operations).

These guidelines should be used by Managers to help them ensure that pregnant workers are accommodated effectively and that the Rullion business remains effective. The guidelines are also specifically designed to assist workers clearly understand how to work safely during the period of their pregnancy.

For the purposes of the guidelines, the term 'pregnant' refers to women who are carrying a child or are breast-feeding following the birth of their child.

26.2 Responsibilities

Managers

Managers are responsible for:

- As soon as they are notified in writing of the pregnancy, undertaking a risk assessment for that employee which must consider:
- Whether the work the employee is expected to do is of a kind which would involve risk, by reason of her condition, to the health and safety of the expectant mother or that of her unborn child from any substances, processes or working conditions
- Risks which may be present in normal work activities but may present a higher risk to new or expectant mothers
- Taking steps to avoid or minimise the risks identified
- Reviewing the assessment at least monthly with the employee
- Monitoring the implementation of measures taken to protect the employee concerned
- Ensuring records are kept of all assessments
- Seeking advice from the Manager responsible for SHE on ways they can minimise exposure to hazards for new and expectant mothers, including the conduct of a display screen equipment assessment

Staff

Employees are responsible for notifying HR and their manager in writing of their pregnancy and producing, if requested, a medical certificate confirming their condition.

It is understood the circumstances of any pregnancy are personal to the people involved, but the Company would encourage its female employees to report their pregnancy at the earliest opportunity, to enable a risk assessment to be conducted and to ensure any measures needed are put into place to control exposure to hazards.

Employees are generally responsible for bringing to the attention of their manager or Manager responsible for SHE any risk or hazardous working condition which might cause harm to themselves or other employees. Note that this includes informing their manager or Manager responsible for SHE of any potential exposure to infectious diseases, which could affect an unborn child (e.g. Rubella (German Measles)).

A checklist is available from HR to enable managers to conduct a pregnant workers assessment.

The following sections are intended as guidance to managers and pregnant workers. Any issues should be discussed with the Manager responsible for SHE for clarification/advice.

26.3 Working hours

To avoid mental and physical fatigue, working hours should not exceed 8 hours per day actual working time (not including breaks and lunch). Physiological changes during pregnancy contribute to an increased risk of fatigue. If this becomes an issue, employees should discuss this with their respective line Managers so that a suitable short-term solution can be agreed to resolve the issue, such as a temporary change in role, working hours and/or more frequent breaks. Fatigue can result in accidents and injury due to inability to concentrate effectively and can also lead to other health complications, so it is important that this is addressed promptly.

26.4 Standing or sitting for long periods

If tasks require long periods of sitting or standing the following guidelines should be applied:

- It is advisable not to stand for more than 30 minutes at any one time. Consider whether the task can be done sitting down, split into sections or rotated with another task to reduce the amount of standing time?
- It is advisable not to sit in one position for more than one hour. Try to ensure tasks are rotated to ensure regular movement i.e., visits to the photocopier or printer, coffee breaks, comfort breaks etc.

Standing and sitting for long periods of time have been associated with a number of issues, including dizziness or fainting. Sitting can contribute to aching legs and muscular pain. In more severe cases postural issues have been associated with the risk of thrombosis, miscarriage, premature birth and low birth weights, therefore the above precautions will ensure that risks are minimised.

26.5 Manual Handling

Pregnant employees are advised to refrain from all manual handling tasks. These should be re-allocated to other employees during the period of pregnancy.

26.6 Working at heights – ladders

To help avoid risks of injury through falls, pregnant employees must refrain from working at heights; this includes the use of stepladders and other ladder equipment, which can be unstable. If the use of ladders is required to assist manual handling tasks, or to reach shelves or cupboards i.e., moving stationery, office furniture or equipment, water bottles etc. this must be re-allocated to another employee for the period of the pregnancy.

26.7 Lone workers

There are increased risks of dizziness, fainting, strains, slips, trips, falls and a number of other issues during pregnancy and a lone pregnant person would be highly vulnerable. Pregnant employees must not therefore be left working alone in any Rullion office and must always be accompanied by at least one other person, who could offer assistance in the event of a problem or ill health. In the event of any problem arising involving a pregnant person, advice from a qualified medical practitioner must be obtained.

26.8 Stress and Anxiety

Stress and anxiety can be caused in a number of ways and can affect any person; however, risks are increased in pregnancy due to hormonal, physiological and psychological changes that take place. Areas for concern can include:

- Anxiety about the pregnancy
- Combining work with private life
- Financial worries
- Emotional and personal issues
- Possibility of job insecurity

It is therefore important that Managers and staff have an awareness of the potential risks so any issues can be identified at an early stage and appropriate support can be provided. Employees should be encouraged to use the Employee Helpline facility and to discuss work related issues with their Manager. An adjustment to working hours may be required in some cases.

26.9 Breaks

Managers should ensure that pregnant workers take a 10-minute break in the morning and afternoon, in addition to taking a lunch break, to ensure that fatigue risks are minimised.

26.10 Travelling

This can become very uncomfortable and tiring during pregnancy, therefore any travelling required should be minimised where possible regardless of the mode of travel (air/rail or car). If using a Company car, a risk assessment must be undertaken to ensure the following:

- That there is sufficient room to accommodate an increase in abdominal size
- That the person can easily reach the pedals and controls
- That the vehicle can be manoeuvred without overreaching and in a safe and comfortable manner
- That visibility is not restricted due to reduced movement and flexibility

If any issues are identified, driving must not continue, and alternative methods of travel must be considered if the journey cannot be eliminated completely.

26.11 Welfare Facilities

It is important that the opportunity to take regular refreshment is not restricted and that a supply of fresh drinking water is available. Drinking is essential to reduce the risks of infection and kidney disease.

Excessive heat can increase risks of fatigue, nausea, dizziness and fainting. It is important to ensure that the working area is well ventilated and not too hot. Consideration should be given to the provision of desk fans where appropriate and where requested or a temporary change of workstation if necessary.

Easy access to clean toilet areas with hand and face washing facilities including soap, hot and cold running water and drying facilities (towels or hand driers) must be provided. In addition, kitchen facilities should be kept clean with adequate hand washing facilities available.

Adequate private facilities must be provided to facilitate a rest area if required. The provision or availability of a meeting room is sufficient provided there are facilities for the person to sit or lie down comfortably if required.

26.12 Workstations and Posture

A risk assessment must be undertaken for any pregnant person using Display Screen Equipment, to ensure that the workstation remains comfortable for the period of the pregnancy. Some changes may be required to enable the employee to reach the keyboard and mouse comfortably.

Support for the legs and back are important to ensure good posture and to reduce the risks of muscular pain and aching. The individual should be advised not to sit for more than an hour at a time to limit the amounts of time spent sitting in one position.

Scientific evidence shows that pregnant women do not need to stop working with DSE however if any person who is pregnant or planning a family has any concerns they should be encouraged to use the Employee Helpline or to contact the National Radiological Protection Board on 01235 822876, who will be able to provide current authoritative scientific information and advice.

26.13 Clients Premises and PPE (Personal Protective Equipment)

Specialist equipment and PPE (Personal Protective Equipment) are not required in the normal course of work in Rullion offices. If the pregnant person is a sales consultant and is likely to visit clients' premises, it is important that checks are made first to ensure that there are no health risks likely to affect a pregnant person i.e. radiation levels on a nuclear site, risks of slips or trips on a construction site etc. If there are substantial risks then the visit should be postponed or undertaken by an alternative employee.

Checks must always be made with clients regarding the requirement for PPE for any Rullion employee visiting a Client site, and if this is a pregnant worker, then it is important to establish whether the PPE would cause any restrictions, discomfort or overheating due to changes in size/shape. If this is the case and PPE cannot be worn comfortably, site visits should be undertaken by an alternative member of staff during the period of the pregnancy or nursing period after pregnancy.

If an employee is required to use work equipment whilst pregnant, then a risk assessment must be undertaken to ensure that the equipment can be operated safely taking into account physiological changes.

26.14 Summary

Each Rullion office will be required to apply these rules in their own environments. As the requirements across Rullion vary, dependent on industry sector and style of working, the detail relating to some of these issues must be addressed at Location level.

Any arrangements, risk assessments or issues relating to pregnancy must be clearly documented and held in the employee's file.



SECTION 27. EMERGENCY CONTINGENCY ARRANGEMENTS

Please refer to Rullion Disaster Recovery Plan.

Where any emergency arises, a steering committee for rectifying the situation must be formed at the earliest opportunity involving the following parties:

- Representative from the localised affected area i.e., Manager
- The relevant Executive Director
- The Business Services Manager (for insurance purposes)
- The Manager responsible for SHE

SECTION 28. STRESS

28.1 Introduction

Rullion is committed to protecting the health, safety and welfare of its employees. The Company recognises that work-related stress can damage the mental and physical health of its employees and that work-related stress is a health and safety issue, which must be taken seriously by the Company.

This policy will apply to everyone in the organisation including contractors.

28.2 Definitions

The Health and Safety Executive define stress as “the adverse reaction people have to excessive pressure or other types of demand placed on them”. This makes an important distinction between pressure, which can be a positive state if managed correctly, and stress, which can be detrimental to health.

Stress can affect anyone and is not a sign of weakness.

28.3 Responsibilities:

Managers are responsible for ensuring:

- Good two-way communication between themselves and their staff
- Staff are consulted and provided with constructive feedback in the course of their work particularly when changes are being proposed or implemented
- Bullying and harassment is not tolerated within their area of responsibility
- Working hours and overtime are monitored to ensure that staff are not overloaded or overworking
- Holidays are monitored to ensure that staff are taking their full entitlement
- Staff have adequate opportunities for rest, meals and refreshments
- They attend training as requested in good management practice and health and safety
- Staff are fully trained to carry out their duties
- Staff are provided with meaningful developmental opportunities
- Staff experiencing stress have access to appropriate sources of advice and support
- Lone workers are provided with effective supervision and support
- Additional support is offered to any member of staff who is experiencing stress caused by issues outside of work, should it be appropriate
- A culture where stress is not regarded as a weakness is encouraged
- Recommendations of risk assessments carried out within their area of responsibility are implemented

The People Team will:

- Give guidance to managers on the stress policy
- Assist in monitoring the effectiveness of measures to address stress by collating sickness absence statistics and any other relevant data
- Advise managers and individuals on training requirements

Employees will:

- Attend preventative stress awareness sessions, when requested, so that they can learn to recognise the signs of stress in themselves and others and be aware of effective strategies to keep stress to the minimum
- Report issues of concern to their line manager, health and safety representative or to the People Team so that any problems can be addressed and where possible prevented
- Accept opportunities for counselling when recommended.



The Manager responsible for SHE and where appropriate Health and Safety Representatives are responsible for:

- Conducting risk assessments, recording the findings, communicating necessary information to relevant parties, making recommendations and following these up
- Providing continuing support to managers and staff and encouraging referral to specialist counsellors where appropriate
- Supporting staff who have been off work due to stress and advising them and their managers on a planned return to work

Health and Safety Representatives must:

- Be meaningfully consulted on any changes to work practices or work design that could precipitate work-related stress
- Be meaningfully involved in the risk assessment process
- Be able to consult with staff on the issue of work-related stress
- Conduct joint inspections of the workplace to ensure that environmental causes of stress are properly controlled

SECTION 29. HEALTH ASSESSMENT / OCCUPATIONAL HEALTH POLICY

29.1 Introduction

Under current H&S Legislation, employers must facilitate relevant health assessment and surveillance dependant on risks. The key legislations are:

- Health and Safety at Work Act 1974
- Management of Health and Safety At work Regulations 1999
- COSHH regulations 2002
- Other specific regulations requiring Health surveillance i.e., Control of Asbestos etc.

Risk Assessments must be undertaken, and a safe working environment provided.

Care must be taken to ensure that employees and potential employees are not discriminated against as a result of any disability or health issue; however, as employers Rullion must also ensure that staff are suitable for the role and able to undertake their work safely.

This policy has been set up to enable Rullion to provide employees with protection and assistance, where necessary taking into account any health-related issues. This includes a process for establishing health issues, understanding and managing these in the workplace, and where appropriate, providing assistance for specialist medical care to ensure staff well-being and consistency of service.

29.2 Responsibilities

Staff

Staff employed by Rullion are responsible for reporting any changes in health or medication to their Line Manager at the earliest opportunity.

29.3 Arrangements

Rullion will ensure a Staff Health Assessment Form (SHA) is completed:

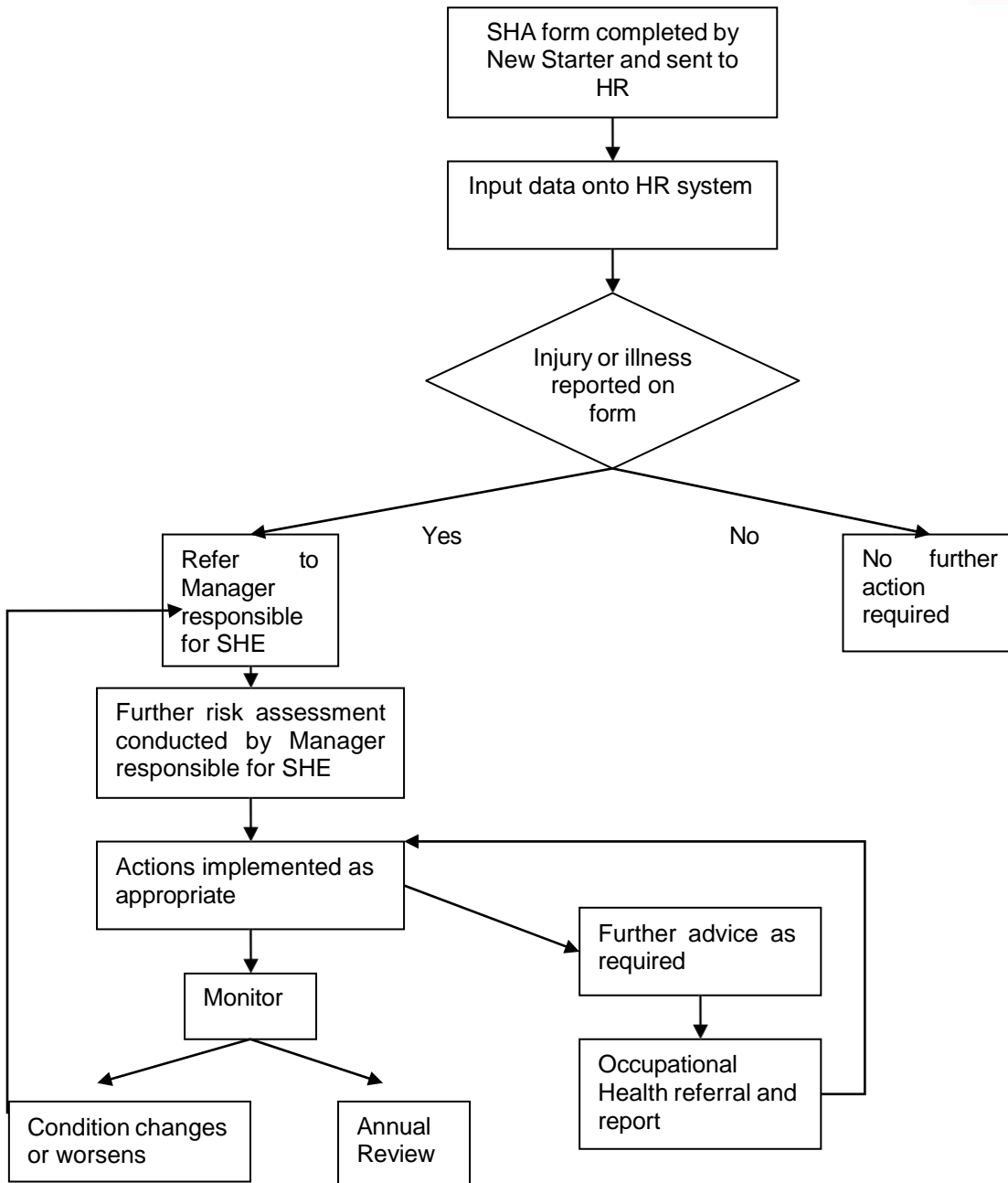
- On commencement of employment
- At regular intervals thereafter where health issues are established; or
- Where there are changes to health

This will enable suitable risk assessments and arrangements to be made in the workplace so as to protect the health of the individual and others. All information will be appropriately recorded to ensure a complete audit trail and to assist with evaluation for assistance where required.

29.4 New Starters

New starters must complete their Staff Health Assessment form, and submit it to the HR Department on their commencement date. Any illness suffered in the past or long term should be reported in order that Rullion has full medical history for each individual. This will enable Rullion to provide a safe working environment for each employee through monitoring of any on-going conditions and provision of medical aid where necessary.

The following page shows a summary of the process:



29.5 Referrals

Where necessary the Manager responsible for SHE or HR will refer to the individual's GP / Medical Provider for further medical information – written permission will be obtained from employee.

When it is appropriate, Rullion may refer the individual to a private consultant/Occupational Health specialist for a second opinion (with employee consent) for the Company to gain access to medical reports. The individual's condition must be having an impact on attendance at work or ability to undertake work tasks.

In certain circumstances it may be that appropriate that financial assistance be provided for a Consultation at the discretion of the Executive Director. Upon receipt of appropriate medical reports, a decision will be made as to whether further financial assistance will be provided for on-going or next stage of treatment. Assistance will be provided on a case-by-case basis and the employee will be fully informed and involved in each stage of the decision-making process.

29.6 Current Employees

On a regular basis the Staff Health Assessment form will be distributed to Group employees so that any changes in their health can be recorded and levels of risk surrounding that condition can be assessed by the Manager responsible for SHE.

Between assessments, any new medical conditions must be reported to management so that the relevant risk assessments can be undertaken in order that Rullion fulfils its Health and Safety obligations to its staff and provides the requisite assistance or equipment to either alleviate the condition or prevent it from impacting on employee's ability to work.

29.7 Medical Assistance

Where medical conditions are reported to Rullion, both for existing employees or new starters, and further to a risk assessment, Rullion will decide upon the required action to take to assist that particular employee to continue with their workload as normally as possible.

Any long-term illness or injury should be reported to Rullion and a risk assessment undertaken by the Manager responsible for SHE. Long term illness or injury could include but is not restricted to:

Diabetes	Back / Neck Disorder
Stomach Ulcer or other Disorder	Loss of Vision / Eye defect
High / Low Blood Pressure	Heart Disease
Stress / Depression	Epilepsy
Migraine	Fainting / Giddiness
Degenerative Disorders	Cancer

Once the risk assessment is complete, advice will be provided to the individual of assistance that can be provided to them in order that they can attend their place of work and undertake their daily tasks.

If any medical assistance is required, the employee will be referred back to their GP for a consultation. Rullion should be kept informed of any issues that arise from this consultation and of any prescribed medicine being brought onto Company premises as per Rullion Drugs and Alcohol Policy. These must be effectively managed to avoid risk to others in the workplace and to meet the specific drug storage/use requirements.

Where employees are provided with Private Healthcare by Rullion, it would be expected that treatment be obtained through this facility, subject to the terms of the Policy.

Where employees are not covered by Private Healthcare and a medical condition is long standing with medical treatment received via the NHS, which is having an impact either on an employee's attendance in the workplace or their ability to undertake their role Rullion may be able to offer further assistance:

1. Further to an initial enquiry from the employee or a risk assessment or return to work interviews following extensive absence and following provision of specific medical details from the GP, Rullion will consider financial assistance to seek private consultation to gain a second opinion on the individual's conditions, treatment and prognosis.
2. Arrangements will be provided on a case-by-case basis and should follow consultation and/or treatment from the NHS in the first instance.
3. The decision upon Group financial assistance will be made by the CEO following consultation and advice from the employee's manager, Manager responsible for SHE, HR and the relevant Executive Director.
4. Provision of financial assistance will be subject to the employee providing their written consent for the Manager responsible for SHE to have access to a medical report from the



appropriate medical specialist following their first consultation. This will enable Rullion to ascertain the long-term impact on the business and the long-term prognosis of the illness or injury.

5. Subject to the findings of the specialist Rullion may make further assistance available. This will be at the discretion of the CEO.

29.8 Absence Management / Amended Working Practises

Where a medical condition involves absence from work due to ill health or for treatment, Rullion will make appropriate arrangements to facilitate appropriate time required but would also request that employees co-operate by arranging appointments at the start or end of the day (where possible).

Where necessary Rullion will consider interim arrangements to facilitate a phased return to work, reduced or amended working hours or practises, or a short-term amendment in the employee's role, to assist with recovery.

Any disciplinary proceedings under the Absence Management Policy will be suspended where a genuine health issue is identified, and an appropriate plan is put in place by agreement between the employee and Rullion.

Where it is identified that an employee is unlikely to be able to manage their role due to their health condition, endeavours will be made to establish alternative roles or arrangements in the workplace. Where a suitable alternative cannot be arranged this may result in termination of employment on agreed terms, between Rullion and the employee.

Please speak to the Manager responsible for SHE or HR for further information.



SECTION 30. WELFARE

Adequate provision will be made for all staff. The specific needs are assessed for each individual office.

30.1 Temporary Workers Welfare

Where the client engages a contractor, then the welfare arrangements shall be established from the Client as part of the pre-start check to ensure suitable provision.

If a Temporary Worker has any concern about facilities provided, they should contact Rullion at the earliest opportunity so that appropriate arrangements can be made.

SECTION 31. VISITS BY THE HSE

Enforcement officers have the authority to enter premises at any time and undertake an investigation or suspend activities and take evidence.

If an HSE Inspector or Environmental Officer visits Rullion premises, Rullion personnel are instructed to:

- Check the identify and credentials of the visiting officer
- Establish the nature of the enquiry and what assistance they require
- Contact the Business Services Manager and the Manager responsible for SHE to inform them of the situation
- Co-operate with any request that is made for information or assistance

31.1 Notices

Enforcement Officers can issue the following notices:

Improvement Notice

This will give notice of any activity that the Enforcement Officer believes is unsafe and will provide a time scale by which improvements must be made. A further visit will be made by the Officer to ensure that satisfactory arrangements have been made by the deadline.

Prohibition Notice

Where the Enforcement Officer believes there is a significant and immediate risk to health and safety they will issue a prohibition notice which will cease the activity of concern until changes are made to render the activity or situation safe. It will also state the arrangements required.

31.2 Prosecution

This will invariably happen if notices are not complied with to a satisfactory level and within required timescales.

31.3 Appeals

Rullion can appeal against the issue of a notice. This must be done in writing within 30 days of the notice being issued. In any such case, the Manager responsible for SHE will manage the proceedings.

SECTION 32. KEEPING UP TO DATE

The company stays up-to date on Health and Safety issues including current legislation and current best practice by:

- Employing its own competent Manager responsible for SHE
- Subscriptions to various Health and Safety journals, websites and regular review of the HSE website
- Membership of professional bodies such as IOSH
- Providing appropriate training for employees
- Using the services of a Health and Safety consultant if appropriate
- Monitoring and auditing Health and Safety procedures
- Reviewing the Health and Safety Management System on a minimum annual basis

Updated H&S information is distributed to employees by:

- Email bulletins
- Dedicated Health, Safety and Environment pages on the Intranet
- Issue of relevant parts of H&S Policy
- Issue of revised Risk Assessment and Work Procedures
- Training

SECTION 33. COMMUNICATING AND PROVIDING INFORMATION

Communication of Health and Safety Information is by the following methods.

33.1 Distribution of Relevant Documents

Item	Method of communication
Health and Safety Policy Statement	Displayed on company notice boards, inclusion in company Health and Safety Management System (on intranet) and issued to all employees and contractors.
Health and Safety Management System	Maintained on intranet. Controlled by the relevant Executive Director. Hard copy in each site for reference.
Risk Assessment, Method Statements and Health and Safety Notices	Individually in hard copy as required to relevant employees and contractors.

Individual Consultants are responsible for distribution of relevant documents e.g. Risk Assessments and Work Procedures to Temporary Workers.

33.2 Day to Day Communication

Day-to-Day Communication on Health and Safety issues is normally conducted by line management. Employees are encouraged to raise any Health and Safety issue with their Line Manager or Business Services Manager in the first instance, who will resolve the issue with due consideration of the full Health and Safety implications. If the Line Manager/Business Services Manager is unable to resolve the issue he/she may seek external advice from the Manager responsible for SHE.

Urgent Health and Safety issues, which present imminent danger, should be raised immediately with Line Managers or Business Services Manager.

33.3 Meetings

The Company will hold meetings at which Company Health and Safety issues will be reviewed.

33.4 Training

Formal Training will be provided to all employees - See Section on Training.

SECTION 34. TRAINING AND INDUCTION TRAINING

34.1 General

The Company will assess the training requirement of all employees and ensure they receive appropriate work-related Safety, Health and Environmental training to ensure they are able to carry out their work in a satisfactory and safe manner.

34.2 Assessment of Training Needs

The Managers of each Location office are responsible for assessing staff training needs and arranging provision of the training via the most effective manner. Assessment of Training and a Record of the Training provided is recorded in the training database.

Assessment of training needs for an employee is to be undertaken when:

- An employee first joins the Company
- An employee is directed to carry out work which is new or different to their normal work
- A new risk arises in the workplace
- A new technology or procedure is introduced
- Any other circumstances which identify a need for specific training

The assessment of training needs should identify any safety critical functions and ensure the training in these respects is kept up to date.

34.3 Induction Training

All employees will receive appropriate induction training when first engaged by the Company. The training will include the relevant procedures developed under this Health and Safety Management System. Training will be provided utilising e-learning facilities where appropriate, or the appointed Health and Safety Representative or Manager.

34.4 Contractor Site Inductions

Contractors working at a Rullion office will receive a site induction by the Location manager or their appointed deputy.

34.5 Training and Induction for Temporary Workers

Temporary Workers placed with Clients undertake their assignment under the supervision, direction and control of the Client, therefore the Client must provide an appropriate induction relevant to their site and working practises.

Temporary Workers must submit details and evidence of all training, skills, qualifications and experience when registering with Rullion and this will be recorded on the individual's records. Rullion will validate and hold copies of all relevant certifications and will ensure that any worker meets the Client's specification for skills, experience and qualifications as required for the role. Rullion will not undertake specific training for Temporary Workers, unless otherwise agreed with a Client, as they have self-employed status under their contractual arrangements, and only suitably qualified workers would be considered for placement with a Client.

34.6 Ongoing Training

Appropriate training will be provided, on an ongoing basis, as a result of the Training Assessment process noted above, with records to be kept on the training database.

SECTION 35. THE PRINCIPLES OF RISK ASSESSMENT

Risk Assessment is the process of balancing the cost and benefit of reducing all types of risk to a project. The types of risks encountered essentially fall into three categories:

- Risks to Project
- Risks to Business
- Risks to the Health and Safety of People

This guideline only considers the risks to the Health and Safety of People, although the principles of this section can easily be extended to other areas.

35.1 Definitions

It is important that a proper understanding of the terminology of risk assessment is gained to prevent confusion during the project process. You should be aware that various organisations and individuals use widely different terminology. You should establish early in the project process that everybody is communicating clearly, and the following definitions will help to do this:

A Hazard - Is a situation with the potential to cause harm.

A Risk - Is an expression of the potential of a hazard to cause harm.

This can generally be expressed as: -

RISK = LIKELIHOOD X CONSEQUENCE

Risk Assessment - Is the process of measuring risk.

Risk Control - Is a measure taken to eliminate, reduce or protect against a risk.

A Residual Risk - Is a risk remaining after a risk control measure (or measures) has been implemented.

35.2 Risk Assessment Process

Risk assessment can be a complex process, but the principles are quite simple. The process in health and safety terms is a three-step approach.



In general Risk Control Measures may completely eliminate the risk or reduce the likelihood and/or protect against the consequence.

35.3 Hazard Identification

The hazard identification process must start with an effective identification exercise. It is difficult to identify every hazard, but a structured and systematic approach is essential to draw out as many of the hazards as possible.

A range of techniques can be used to ensure a systematic approach, and these include:

- Brainstorming
- Discussion with worker(s) undertaking the task
- Hazard identification Checklist
- Review similar examples

It is essential to have people with relevant knowledge and experience present at the hazard identification process. If necessary, further advice should be sought from within Rullion or from outside specialists.

35.4 General

There are many varied methods of risk assessment which can be tailored to suit particular requirements. Most are based on the principle:

$$\text{RISK} = \text{LIKELIHOOD} \times \text{CONSEQUENCE}$$

Assessment techniques may be purely subjective or use numeric methods to quantify the risk. Choice of the most appropriate technique should be made based on the size, nature and importance of the risk.

35.5 Qualitative Risk Assessment

This approach is the one that would be used most frequently for Rullion operations.

In making a qualitative assessment of risk and determining whether the risk is high, medium or low, consideration should be given to factors, such as:

- The number and category of people exposed to the Hazard
- The likelihood and frequency of occurrence
- Consequence of occurrence
- Existing preventative measures

As with hazard identification, it is essential that people with appropriate knowledge and experience are present to make the assessment of risk.

Simple scales can be applied to the likelihood and consequence of the hazard causing harm and judgements made as to appropriate control measures.

High
Medium
Low

In order to quantify risk, we need to first put a scale to the likelihood of the hazard causing an accident and the consequent severity of that accident. Scales can be as small or large as required depending on the complexity of the analysis considered to be necessary and relevant matrixes are included in the risk assessment documentation.

Once the magnitude of each risk has been assessed, the risks can be prioritised, and any mitigating actions determined. The aim of the process is to eliminate or reduce the risk to 'as low as reasonably practicable' before classification as a residual risk. Guidance/decisions may need to be sought from those responsible for the acceptance of the residual risk.

35.6 Risk Control Measures

HSE identifies a preferred hierarchy of risk control principles, which should be followed wherever possible.

<p>1. Elimination e.g. - substituting materials - alternative design - substituting working methods, types of machinery - avoiding certain processes - moving the site</p> <p>2. Combating Risks at Source e.g. - separating operator from risk of exposure - designing for remote operation - isolate or enclose hazard</p> <p>3. Minimising risk by the design of suitable systems of working</p> <p>4. Minimising risk by the use of personal protective equipment and clothing (only as last resort)</p>
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Having implemented appropriate control measures, it may then be necessary to carry out a further risk assessment to determine acceptability and to ensure that other hazards have not been created.

35.7 Recording Risk Assessments

The identification of hazards and results of risk assessments should be recorded on a Risk Register.