

# Health and Safety Policy

Date Approved by Llockh and Safaty Management C

**Date Approved by Health and Safety Management Group:** 

Date Approved by Board:

Date Due for Review:

**Responsible Officer:** 

7 May 2024

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Health and Safety Manager

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## 1. Policy Statement

Good health and safety is integral to good management and I aim to make sure that it continues to be part of the culture of WDH. Employees should have health, safety and welfare objectives agreed with managers and throughout the organisation.

We recognise that complying with the Health and Safety at Work Act etc 1974 and the regulations made under it, is a legal duty, not a matter of choice. Our policy should exceed the minimum requirements of the law where possible and to do this I will provide sufficient resources to meet this commitment. I will also make sure that systems are in place that will allow us to maintain, monitor and continuously improve safety performance. Included in these systems will be means to allow communication and consultation on health and safety matters between all levels within the organisation.

We also recognise the importance of health safety and welfare in all works undertaken and it will continually strive to improve its Occupational Health and Safety (OHS) management and performance. We regard the prevention of accidents and ill health as one of the most important functions of all its managers and supervisors because:

- I do not want any employee or others to suffer as a result of our work;
- I will ensure we comply with all relevant health and safety legislation and other requirements applicable to our work activities; and
- I recognise that accidents and unsafe, unhealthy working conditions can be a considerable drain on our financial resources and demonstrate a lack of efficient management.

In return, I expect employees at all levels to meet their legal duties. This includes cooperating with us on safety matters and taking care of their own safety and that of others, whether from within the organisation or from outside, who may be affected by their actions.

Any information, instruction or training necessary to meet these commitments will be provided to those who require it to perform their work safely. Line managers are expected to monitor performance and make sure standards are not permitted to slip.

I recognise that we also have a duty of care to non-employees, members of the public, tenants, contractors, visitors and other parties, who may be affected by its activities. In addition, we have a duty to make sure that the health and safety requirements for our commercial properties are well managed. The WDH and leaseholder responsibilities for health and safety are detailed and addressed in our Heads of Terms and lease agreement documents relating to these premises. We will also ensure where we are responsible that the environment of the local community is not adversely affected by our work activities.

This policy and the way it is operated will be reviewed at least annually and more often if there are significant changes within the organisation, or changes in legal requirements, which have an impact on our undertaking. Any revision necessary to improve safety performance will be made and then communicated to all employees.

Whilst every employee has some responsibility for health and safety, I, as Chief Executive, accept full responsibility for the health and safety of each and every person who may be affected by the work we undertake. This statement is also signed by the Board Chair, formalising the Board's commitment to health and safety and the monitoring of performance of the Company.

Signed: Andy Wallhead, Chief Signed: Andrew McConnell,

Executive WDH Board Chair WDH

Date: 27 May 2024 Date: 27 May 2024

## 2. The Policy for our workers

- 2.1 We fully recognise and accept that we must provide our employees and people who use our services and buildings with a healthy and safe working environment.
- 2.2 We recognise and accept responsibility as an employer to manage work and services provided in line with the Health and Safety at Work etc Act 1974, other Legal Requirements, Industry Codes of Practice and Company Standards that apply to the activities carried out.
- 2.3 We are committed to the development and implementation of policies and procedures that establish high standards of health and safety and ensuring health and safety performance exceeds those of industry standards.
- 2.4 We will take necessary and appropriate action to reduce potential work related risks affecting the wellbeing of employees.
- 2.5 Health and safety will automatically be considered as part of future planning.
- 2.6 Health and safety will be an agenda item for any Joint Consultative Committee (JCC).
- 2.7 Our Chief Executive has organisational responsibility for health and safety.
- 2.8 The Director of Organisational Development will, on behalf of the Chief Executive, make sure that appropriate detailed working health and safety policies and codes of practice are drawn up and implemented in line with organisational policy.
- 2.9 The Health and Safety Manager (HSM) will co-ordinate the development of appropriate new policies and recommend changes to existing policies that meet the requirements of legislation and good practice.
- 2.10 All managers have day to day responsibility for safety within their work areas. They will make sure that the established measures and procedures for making sure health and safety within their area of control are applied.
- 2.11 All managers will be responsible for making sure that employees in their line management are aware of and are implementing, health and safety policies and procedures as required by the organisation.
- 2.12 Our managers will make all new employees aware of particular hazards and should be aware that accidents can be reduced or prevented by effective supervision.
- 2.13 Health and safety should be an agenda item for employee supervision and appraisal meetings.
- 2.14 Managers will make sure that health and safety issues are adequately covered in all contractual arrangements with service providers contracted to provide services for us.
- 2.15 All employees are responsible for making sure that they take reasonable care of their own safety and that they do not put at risk the safety of anyone else who may be affected by their work.

- 2.16 Employees must cooperate with their employers and others to make sure that the statutory requirements are met.
- 2.17 Appropriate resources and training will be available to employees, in line with organisational priorities and personal development plans. Training given will allow employees to carry out their duties and responsibilities as defined in the policy and will comply with all relevant acts, regulations, approved codes of practice and guidance. We will ensure competence is maintained through refresher training, where required.
- 2.18 To help manage health, safety and welfare, we have dedicated health and safety professionals and will utilise the skill of specialist consultant whenever necessary. Access to specialist advice is made available from HSM.
- 2.19 Monitoring systems will be established to:
  - monitor the effectiveness of policies and procedures; and
  - monitor progress on health and safety initiatives through audits and inspections.
- 2.20 Management information will be provided to assist with the identification of areas of improvement.
- 2.21 The Health and Safety Policy Statement and organisational arrangements will be annually reviewed to monitor its effectiveness, continually improve the health and safety management systems and to meet changes in legislation and the needs and circumstances of the business. We shall undertake to discharge our statutory duties by:
  - carrying out obligations that are set out in the policy;
  - making available all necessary resources, both financial and practical to ensure the health and safety of all who may come in contact with our work;
  - co-operating with everyone who has an interest in health and safety:
  - identifying hazards in the workplace, assessing risks related to them and implementing appropriate control measures;
  - providing and maintaining safe plant and equipment;
  - providing and maintaining a safe working environment;
  - providing and maintaining adequate welfare facilities;
  - establishing and enforcing safe systems of work;
  - consulting with our employees on all matters relating to health, safety and welfare:
  - promoting awareness of health and safety and of good practice through effective communication of relevant information;
  - working with only approved contractors and suppliers;
  - providing a safe working environment for our employees, so far as this is reasonably practicable and for the safety of the general public and others not in our employment (authorised and unauthorised) who may be affected by our work activities: and
  - ensuring all commercial properties are managed to the same standard as all other properties in our portfolio.

#### 3. WDH structure

#### **WDH Structure**

## 4. Individual responsibilities within WDH

#### 4.1 The Board

The Board is responsible for:

- providing health and safety leadership within WDH;
- making sure that we operate within a framework that effectively identifies and manages health and safety risks;
- making sure that the necessary management arrangements, resources, skills and systems are in place for the effective management of health and safety within WDH to meet legislation and best practice requirements;
- making sure that the Health and Safety Policy reflects current Board priorities;
- making sure that all Board decisions reflect its health and safety intentions, as articulated in the Health and Safety Policy;
- recognising its role in engaging the active participation of workers in improving health and safety by the effective utilisation of the Health and Safety Champion;
- making sure that it is kept informed about any significant health and safety failures and of the outcome of the investigation into their causes; and
- monitoring health and safety performance and maintaining awareness of key health and safety challenges through the Governance Committee, for employee related health and safety and Property Investment Committee, for landlord compliance and building safety, meetings, with a view to informing and influencing the wider Board.

#### 4.2 Chief Executive

The Chief Executive has overall responsibility for health and safety within the organisation and is required to:

- advise the Board of any problem arising in connection with the implementation of health and safety legislation and the resources needed to meet requirements;
- make sure all levels of management know and accept their individual responsibilities regarding health and safety and that requirements and objectives are met;
- make sure that everyone in WDH has health and safety issues as a high priority in their work and are able to deal effectively with such issues when they arise;
- make sure that articles, plant, tools, equipment and substances purchased for use at work are safe and comply to relevant standards;
- make sure that all work equipment we supply is adequately maintained;
- make sure that safe systems of work are developed and used;
- make sure that premises used by employees and members of the public are safe and do not present a significant hazard to users or occupants;

- make sure that sufficient information, instruction, training and supervision is made available to enable all employees to avoid hazards and contribute positively to health and safety whilst at work or at home;
- make sure such medical supervision and monitoring is provided as is necessary to provide a healthy and safe working environment for all employees;
- monitor the performance of subordinates with regard to health and safety; and
- make sure formal arrangements for consultation, discussion and the communication of health and safety issues are in place that will involve all levels of WDH.

#### 4.3 Directors

The Deputy Chief Executive will assist and deputise for the Chief Executive. Directors are responsible for the overall effectiveness of health and safety matters in their areas of responsibility. They are required to:

- advise the Chief Executive of any problem arising in connection with the implementation of health and safety legislation and the resources needed to meet requirements;
- make sure corporate health and safety policies are brought to the attention of all personnel within their area of responsibility and are implemented;
- encourage a positive attitude towards health and safety within managers' area of responsibility;
- evaluate if adequate resources are being made available to allow corporate and team objectives to be achieved;
- establish and maintain effective channels of consultation and communication between employees, safety representatives and management;
- monitor the performance of their managers with regard to health and safety;
   and
- seek advice from the HSM on issues of health and safety.

## 4.4 Director of Organisational Development

In addition to the duties placed on all the Directors of the company, the Director of Organisational Development is responsible for making sure individuals' personal records are kept up to date and that a suitable training programme is maintained that addresses the needs of employees at all levels. Detailed responsibilities for health and safety include:

- co-ordinate a safety training programme for all levels of employees and consult widely to ensure the effectiveness and relevance of this training;
- liaise with the occupational health service, in conjunction with the HSM, where necessary in the interest of the health and welfare of employees;
- make sure that an adequate risk assessment is carried out for any young persons engaged on work experience before work starts and that the risk assessment is copied to the young person's parent, guardian or school as required.

#### 4.5 Executive Director of Investment

In addition to the duties placed on all the directors of the company, the Executive Director of Investment is responsible for ensuring compliance with all building health and safety requirements and regulations and regulations relating to the control of construction sites.

## 4.6 Managers

Managers are responsible for the detailed arrangements necessary to achieve our health and safety objectives within the areas they control, including any activities carried out by contractors on behalf of the company. All managers shall make sure that:

- complete all health and safety training as required;
- company health and safety policies are brought to the attention of all personnel within their area of responsibility and are implemented;
- a positive attitude towards health and safety within their own area of responsibility is encouraged;
- adequate resources are made available to allow objectives to be achieved;
- adequate channels of consultation and communication between employees, safety representatives and management are maintained;
- adequate amenities are available in the operational areas for employees;
- a proper working environment is maintained, especially in regard to satisfactory standards of cleanliness, heating, lighting, ventilation and the provision of fire-fighting and first aid equipment and effective storage of harmful substances and flammable materials;
- all necessary steps are taken to safeguard employees by conducting risk assessments and inspections;
- records of any risk assessment or inspection are kept and any remedial action recommended is noted and actioned as required; risk assessments are reviewed on a cyclical basis and that review periods are commensurate with the risk;
- risk assessments are reviewed when other occurrences mean that the risk is no longer fully managed (changes in procedures and practices, equipment and substances, changes in legislation and following serious incidents);
- copies of risk assessments are provided to the Health and Safety team for recording and monitoring purposes;
- all employees receive adequate training in safe working practices and their assigned responsibilities before taking on new tasks, paying particular attention to young employees and new starters;
- employees are made aware of particular hazards if they are required to work in situations where hazards may exist or may develop;
- any work equipment provided is suitable for the particular work for which it is to be used and is maintained to a safe standard:
- suitable personal protective equipment (PPE) is made available and is worn where hazards exist which cannot reasonably be eliminated by engineering means:
- emergency procedures are effective, practised and made known to persons who may be exposed to the hazards;

- accident reporting procedures are clearly understood and followed;
- all accidents are investigated and a report provided to the HSM;
- make sure employees returning from illness or accident are interviewed by their immediate manager and any measures required are actioned;
- HR procedures are understood and followed when deviations from safe working practices are detected;
- safety representatives are afforded adequate facilities to fulfil their role and are consulted on matters concerning health and safety;
- they have a designated deputy in their absence;
- they monitor the performance of subordinates with regard to health and safety;
   and
- they seek advice from the HSM on any health and safety matter they are not sure about.

## 4.7 Health and Safety Manager

The HSM is responsible for providing a comprehensive advisory service to WDH, covering both client and contracting operations. The specific work responsibilities are:

- assist management with the strategy for health, safety and risk management;
- the formulation of policies and procedures for implementation by managers to make sure that efficient and effective health, safety and risk management practices exist across WDH;
- develop and maintain an Occupational Health and Safety Management system that is compliant with the requirements of ISO45001
- the provision of specialist advice and guidance to all employees to assist in the development of safety awareness training for WDH;
- to assist risk assessors and managers, as appropriate, in undertaking risk assessments and safety inspections and audits as required throughout WDH, recommending effective control measures where appropriate;
- to help promote corporate health and safety performance standards and to assist in the implementation of procedures for auditing these standards;
- to develop a positive relationship with officers of the Health and Safety Executive (HSE) and other enforcement authorities;
- to review reports of all accidents and compile statistics to identify causes and trends and make recommendations to improve performance:
- to assist in the investigation of any serious accident or near miss accidents and to prepare reports of such investigations, with recommendations to prevent recurrence;
- to investigate all new technology, plant, articles and substances and to advise on any precautions or procedures that may be necessary;
- to advise on the provision and suitability of PPE;
- to carry out special surveys, assisted by other specialists as necessary, in order to identify unsafe of unhealthy conditions;
- to carry out ad hoc inspections of work in progress and to attend pre start progress meetings if requested;
- to liaise with the occupational health service in conjunction with personnel and line manager for employee referrals;

- monitor the services provided by external organisations to make sure timely action is taken on areas of concern;
- evaluate contracts for health and safety services;
- make sure a library of information on health and safety matters is maintained and up to date, and to keep informed of current legislation, codes of practice, guidance notes and so on, or repercussions of case law decisions;
- keep up to date on any changes in legislation, codes of practice or best practice which may have an impact on the company and to bring these to the attention of management;
- to attend or offer advice to safety committees or working groups;
- to set a personal example by positive health and safety behaviour;
- advise on health and safety training requirements; and
- shall, where appropriate, have the power to stop any work activity which in their opinion involves a risk of major injury to persons.

## 4.8 Building Safety and Compliance Manager

The Building Safety and Compliance Manager is responsible for ensuring compliance with all building safety regulations, property compliance regulations and legislation and construction / property related health and safety requirements including Construction Design and Management (CDM), and control of construction sites. The specific work responsibilities are:

- be responsible for the strategic direction and pro-active development of the building safety and compliance function within the business; being the "second line of defence for all property compliance related functions;
- develop and maintain compliance, health and safety management systems including quality assurance systems and compliance with external audits including CHAS and ISO14001;
- ensure that the compliance obligations of WDH are met through the management of the technical team in conjunction with colleagues across the business to meet regulatory requirements and key performance indicators;
- ensure WDH meets its legal and best practice responsibilities with regards to all building safety and compliance undertakings and WDH's CDM and contractor management obligations;
- regularly review policies and procedures to confirm that they meet the relevant regulatory standards across all areas of property compliance working with internal and external technical experts as required;
- develop and maintain a high level of personal expertise in building safety and regulatory compliance legislation and best practice;
- be responsible for ensuring all building safety and compliance risks are included on the WDH Risk Register and implement effective appropriate systems to address the risks identified;
- manage and ensure that data validation and assurance of all compliance related functions carried out by the team is carried out and accurately reported to Strategic Compliance Group and Property Investment Committee;
- provide advice and guidance on compliance matters to senior management, stakeholders and colleagues, undertaking ad hoc investigations as required;
- be responsible for developing and recommending changes to policies and procedures, which meet the requirements of new or changing legislation and good practice and which are complementary to WDH policies;

- advise and support managers in the implementation of building safety and the development and operation of safe systems of work;
- develop effective working arrangements with managers and unions to raise and maintain the profile of compliance within WDH;
- manage and control building safety and compliance related budgets including but not limited to, fire safety budget, legionella management, ensuring that spending is appropriate, cost effective and in line with financial regulations;
- act as the WDH responsible person for the management of legionella in its properties;
- maintain and monitor statistical information relating to building safety and compliance issues and prepare and present appropriate reports to management on trends and emerging risks and issues together with recommendations on policy changes and training needs as required.
- keep abreast of developments and best practice in the field of compliance and building safety to enable appropriate policies and procedures to be developed to ensure WDH meets its legal responsibilities and that managers are provided with timely advice.
- undertake and support audits, develop IT and process maps. Monitor in house constructor performance to ensure any fall in standards are identified and addressed in a timely manner, contribute to the performance review and support procurement ensuring contractors meet all regulatory requirements;
- draft tenders and procurement documentation to support the procurement team in the compliant and effective procurement of any and all contractor arrangements;
- represent WDH at any external meetings where building safety and property compliance related matters will be discussed;
- work with the Assets team to undertake a monthly reconciliation of compliance related data to identify and additions or deletions of components that should be added or removed from servicing contracts; and
- carry out as necessary monthly employee performance reviews to monitor performance and maintain delivery, and to take such action as required to address any underperformance.

## 4.9 Employees

All our employees, irrespective of the position held, have a responsibility to:

- follow our Health and Safety Policy and any other policies applicable to their work; failure to do so could result in disciplinary action;
- take reasonable care for their own health and safety and that of other persons who may be affected by their acts or omissions, including members of the public, visitors and contractors;
- co-operate with WDH and its managers to enable compliance with statutory duties and objectives and targets;
- adhere to any safe systems of work, risk assessments and policies we introduce;

- inform us of any health and safety risks or shortfalls in provision of health and safety standards;
- attend any health and safety training we deem necessary;
- avoid improvising work methods or taking short cuts, which would present a risk to themselves or others; and.
- ensure all accidents and near miss incidents are reported as soon as possible to their line manager.

## 4.10 Contractors

Contractors have duties to comply with current legislation and ensure their employees and others are not affected by their activity.

#### **Contractor's responsibilities**

- Providing risk assessments and any other safe systems of work (SSOW) and proof of competence (industry specific training cards) for the activities they carry out, in a timely manner prior to the commencement of the work.
- Complying with our policy and procedures.
- Stop work if they feel work activity carried out is unsafe and advise us immediately.
- Carry out all work safely, in line with current legislation and take into account the health and safety of other on the premises and the general public.
- Report hazards and near misses.
- Contractors who are not working safely or who fail to abide by the health and safety policy and procedures will be removed from the premises.
- Any materials or substances brought onto the premises will be used and stored in line with current legislation. COSHH (Control of Substances Hazardous to Health) Assessments will be available to those affected.
- All machinery and equipment brought onto the premises must be in good working order and relevant certificates provided for checking.
- Supply and use power tool, which are electrically safe through reduced voltage (110 volts) or are used in conjunction with a safe residual circuit device. All transformers, generators, extension leads, plugs and sockets must be for industrial use; equipment will be tested in accordance with the Electricity at Work Regulations 1989.
- Any injury suffered or damage caused will be immediately reported to us.
- Provide details of their competent health and safety advisor, when requested to do so.
- Keep workplace tidy and remove rubbish and waste materials on a regular basis.
- Attend site specific inductions and wear appropriate protective equipment.
- Obev site rules.
- Comply with the contents of the Construction Phase Plan, where applicable
- Contractors wishing to further sub-let their works must obtain approval from WDH.

## 4.11 Suppliers

Suppliers have duties to comply with current legislation and to ensure their employers and others are not affected by their activities.

#### Suppliers will:

- comply with our policy;
- deliver articles and substances in line with current legislation;
- delivery drivers to report to reception or site office upon arrival and await instruction;
- provide weights of materials supplied
- provide material safety data sheets for substances supplied;
- obey site rules and traffic management;
- report injuries or damage to us;
- ensure drivers hold relevant driving licence;
- employees attend appropriate training;
- provide relevant certification for plant and machinery and ensure equipment and machinery conforms to current legislation and is appropriately maintained;
- wear appropriate PPE; and
- provide necessary technical and product information.

## 5. Arrangements

#### 5.1 General conduct

All employees should realise that they represent WDH whenever they interact with its customers (internal and external). As such all employees should conduct themselves in an appropriate manner, for example:

- set a good example;
- make sure that they are aware of emergency procedures;
- sign in and out whenever they enter or leave the building where such systems are in place;
- obey all warning signs;
- make sure that care and attention is given to the health and safety of all visitors under their supervision;
- make sure equipment which is not required to run overnight is switched off before leaving your place of work;
- wear appropriate PPE;
- identify, report and eliminate unsafe acts and unsafe conditions;
- report accidents of all types; and
- take suitable safety precautions when handling chemicals this includes being made aware of the information contained in the COSHH risk assessment.

#### **Employees should not:**

- knowingly place themselves or any other person at risk;
- leave any structure, article or substance in an unsafe condition;
- indulge in horseplay that may lead to injury or any other loss;
- obstruct emergency equipment or exits;
- operate equipment that they have not been trained in its hazards and use; and
- ignore any safety guidance, information and training provided to carry out their work safely.

#### 5.2 Drug abuse and drinking alcohol whilst at work

Working whilst under the influence of drugs (prescribed or otherwise), including alcohol that may affect perceptions or an ability to react to an emergency will not be tolerated. Persons whose behaviour is adversely affected by drugs or alcohol or caught drinking alcohol, taking or using prohibited drugs will be subject to disciplinary procedures, this could constitute gross misconduct, which may result in dismissal.

The use of prescribed drugs whilst at work should be discussed with the persons GP and where side effects, such as drowsiness, could adversely affect that person, this must be declared to their line manager. This may result in adaptations to working practices and procedures or transfer to alternative duties.

In cases of dependence (alcoholism or addiction), we will offer appropriate support to assist in rehabilitation. This could take the form of referral to the occupational health service, support groups and so on.

Refer to Employee Drugs and Alcohol Policy.

## 5.3 Health and hygiene

#### All employees must:

- obtain all water for drinking from the kitchen areas or water dispensers provided;
- protect or wash hands regularly when working with chemicals, particularly before consumption of food;
- wear appropriate personal protective clothing for the activities being undertaken; and
- attend for health surveillance when invited in line with agreed procedures.

#### **Employees must not:**

- store, prepare or consume food and drink in any place where harmful chemicals are stored or used;
- allow clothing to become contaminated so as to present a hazard to health;
- wear contaminated protective clothing in the canteen and kitchen areas; and
- smoke in any of our buildings, vehicles or tenants' homes or any area where the inhalation of fumes may arise – this includes the risk of passive smoking.

### 5.4 Occupational health

We recognise and accept our responsibility to meet our legal duty under the Management of Health and Safety at Work Regulations 1999 and other legislation to provide our employees with health surveillance, which is carried out by an independent occupational health provider.

The aim of health surveillance is to manage the health of all employees who are identified by risk assessments, as being exposed to potential health risks during the work they undertake whilst employed by us.

Our occupational health provider will:

- conduct pre-employment health assessments; and advise on suitability for a particular role as well as any adjustments which may be recommended;
- provide health surveillance to all employees affected by night working, noise, vibration, and harmful chemicals and substances;
- provide health promotion and education which will include the provision of blood pressure, diabetes and BMI checks and other health and wellbeing initiatives such as flu vaccinations;
- provide managers with a written report outlining any adjustments or support which may be required to keep employees healthy and safe at work;
- recommend that employees are referred to a physiotherapy provider if necessary;
- signpost employees to the Employee Assistance Programme (EAP) service and recommend that employees are referred for counselling for other conditions including stress and bereavement; and
- provide health related advice and guidance to managers.

The occupational health providers can also request from our employees' doctors; any advice and notes relating to their condition.

## 5.5 Pandemics and public health emergencies

In the event of the Government announcing a pandemic, public health emergency or any other serious risk to public health, WDH will in conjunction with the occupational health provider:

- Assess the initial requirements of any legislation, guidance or emergency measures brought in to being, the risk to personal health and the impact on business. This should be undertaken by the Senior Management team with support from the HSM and any other relevant parties.
- Where necessary and proportionate, WDH will establish a command structure to manage the situation. This will typically consist of a bronze, silver and gold hierarchical structure, based on the existing model.
  - Bronze groups will concentrate on business operations and will be responsible for establishing safe working practices and co-ordinating actions.
  - Silver group will be responsible for co-ordinating the response of bronze teams, establishing safe working practices across the business and producing communications.

- Gold group will be responsible for overall command and oversight and will ensure that all necessary resources are made available for managing the emergency. Gold group will retain ultimate responsibility for the actions of WDH throughout.
- Follow the actions set out in the organisations Business Continuity Plan (BCP) and review and revise these procedures as necessary.
- Communicate the requirements of any guidance and legislation across the business by the most effective means and in a timely manner.
- The HSM will be responsible for the production and implementation of a 'Corporate risk assessment'. This will act as a framework document for the organisation to review its existing risk assessments and other safe working procedures. The corporate risk assessment will comply with the requirements of the relevant legislation and guidance as a minimum standard and will exceed this where it is practicable and beneficial. The document will be reviewed and revised, periodically, or following changes in guidance, legislation or other changes in circumstances. This will be the responsibility of the HSM.
- Individual departments will be responsible for reviewing and revising their
  existing risk assessments and safe working practices in line with the corporate
  risk assessment. This should be co-ordinated through Bronze Command
  groups and copies of these should be forwarded to the Health and Safety
  team for recording and quality control.
- Ensure that union representatives are kept informed and are consulted on any significant changes to their members working practices.
- Where required by guidance or legislation, identify any vulnerable employees who may be at additional risk and manage the needs of these individuals. This may entail undertaking personal risk assessments, occupational health consultations and ensuring additional controls are put in place. This may also include removing employees from front line duties or temporarily allocating suitable tasks. The responsibility for identifying and communicating with these employees and their line managers, sits with the Health and Safety and HR team.
- Where required, reduce or remove employees from corporate premises and other WDH working locations to reduce the transmission of any pathogens. This may include re-locating to other business premises or working from home
- Establish additional control measures in corporate premises and other WDH
  working locations which are required to remain open. This could include social
  distancing, additional provision of PPE and cleaning / sterilising products and
  reducing occupational capacity. This should be coordinated through the
  command structure and responsibility for managing any changes in corporate
  premises sits with the Facilities team and Assets.
- Where required, prevent or limit access to members of the public to WDH premises, this may include offices, hubs, independent living schemes and other locations.
- Assess the impact of our undertakings on others not in WDH's employ (Tenants, members of the public, visitors, contractors). This may involve a temporary reduction of service delivery. All potential reductions in service delivery must be referred to Gold team through the command structure before commencing.

- Assess other potential health impacts as a direct result of instigating emergency procedures, such as mental wellbeing and homeworking and report these findings to the command structure for action.
- Accurately record and report any instances of illness in accordance with the
  organisation's sickness absence procedures and any other temporary
  requirements. Managers are responsible for managing the sickness absence
  of their team members and should seek advice from the HR team when
  unsure.
- Ensure that any employees who fall ill, demonstrate symptoms, test positive for a specified illness or are requested to, remain away from the workplace, until they are safe to return, as set out in guidance or directed by a medical professional.
- Managers conduct a localised track and trace with any infected employees to establish if they have been in contact with other WDH employees or customers and whether further action is required to notify others. Outcomes should be reported to the Health and Safety team.
- Ensure that the outcomes of any medical tests are requested from employees and recorded for monitoring and managing purposes (subject to GDPR requirements).
- Liaise with external bodies and enforcing agencies (UKHSA, HSE and so on) and ensure any reporting duties are complied with.
- Communicate relevant public health information from outside bodies (NHS, UKHSA, Government and so on) throughout the organisation by the most effective means and ensure that safe operating procedures reflect this information.
- Implement suitable 'screening' questions for customers, to establish any vulnerable people or infected households. Ensure that additional controls are in place for essential or emergency work that is required at these locations.

Any failure by an employee to observe or pay due regard to safety measures or controls set out in guidance, legislation, or other safe systems of work may result in disciplinary procedures.

#### 5.6 Risk assessments

Risk assessments are seen as the cornerstone to good health and safety management.

The HSE hold the view that:

'Organisations achieving high standards of health and safety allocate health and safety responsibilities to line managers, while specialists act as advisers'.

Risk assessments shall be carried out within the organisation to identify hazards, assess risks and recommend additional control measures. These risk assessments will be reviewed and revised, as appropriate, periodically or when significant changes to working practices or equipment occur, including changes to existing legislation. Commonly used risk assessments will be made available to employees through our Hub on the Health and Safety page. Risk assessments for specialist or ad-hoc activities, may be kept in departmental records.

Managers will be involved with all risk assessments so that any findings can be acted upon as necessary. These actions will be prioritised according to the level of risk. Where there is an immediate and imminent risk of serious injury, that working practice or job will be halted until such a time as suitable and adequate controls have been implemented.

Recognised trade union representatives and employees will where necessarily take part in the risk assessment process following request to the relevant manager.

Systems and procedures will be developed for tasks with specific hazards and risks to reduce those risks to as low as is reasonably practicable. Information, instruction and training will be given to those persons identified as required to undertake the task. Managers are responsible for developing safe systems of work and ensuring employees consistently follow them.

Risk assessments are a fundamental part of our overall health and safety management system.

To enable us to comply with our responsibilities, managers and supervisors will:

- identify the hazards;
- identify who will be harmed and how;
- assess the risk and control measures that may be required;
- record these findings; and
- review the assessment and amend as and when necessary.

Refer to Risk Assessment and Risk Management Policy.

When assessing the risk, managers are required to refer to the relevant policies.

- Risk Assessment and Risk Management Policy.
- Manual Handling Operations Policy.
- Hand Arm Vibration Policy.
- Noise at Work Policy.
- Needle Stick Injuries Policy.
- New and Expectant Mothers at Work Policy.
- Personal Protective Equipment Policy.
- Personal Safety Policy.
- Asbestos Safety Policy .

- Repetitive Strain Injuries Policy.
- Stress at Work Policy.
- Young Persons Regulations Policy.
- Snow Clearing Policy.
- Smoking Policy.
- Hepatitis B Policy.
- Fleas and Insect Policy.
- Hot Working Conditions Policy.
- Infection Control Policy.
- Legionella Policy.
- Lifting Equipment and Accessories Policy.

## 5.7 Construction (Design and Management) Regulations

We recognise our duty to follow the Construction (Design and Management) Regulations 2015 (CDM 2015) when taking on the role of Client, Principal Contractor, Principal Designer or contractor.

#### As the Client, we will:

- appoint a Principal Designer, where required;
- appoint a Principal Contractor, where required;
- make sure the Principal Designer and Principal Contractor carry out their duties;
- make sure there are suitable arrangements for managing a project, including the allocation of sufficient time and resources for each stage of the project;
- provide pre-construction information to designers and contractors;
- ensure notification is issued to HSE for notifiable projects;
- provide information relating to the Health and Safety File to the Principal Designer; and
- retain and provide access to the Health and Safety file to Principal Designer.

#### As the Principal Contractor we will:

- prepare, develop and implement the construction phase plan including site rules, making sure ongoing implementation and development continues throughout the contract; any significant changes will be brought to the attention of all parties affected; these include designers, contractors, employees and visitors;
- make sure the construction phase plan is properly planned, managed and monitored; adequate resources will be provided and site management have the appropriate skills, knowledge and experience to effectively deal with the activity and risks on site;
- make sure appropriate competencies to address health and safety issues are available to manage the construction phase;
- make sure the client is aware of their duties under CDM 2015 and comply with the requirements of Schedule 2 of the CDM regulations and part four which relate to health and safety on construction sites;
- provide contractors with relevant parts of the construction phase plan and relevant information about the project that they would require to enable them to carry out work on site safely and without risks to their health;
- ensure workers are consulted and engaged securing health and safety;
- check the competencies of all appointees;
- provide suitable welfare facilities from the start of all projects and maintain these throughout the construction phase;
- provide all workers with site induction and any further training / information needed for the work undertaken;
- consult with workers through the Health and Safety Management Group and other channels on health and safety matters;
- liaise with the Principal Designer (where required) regarding on going design issue:
- provide the Principal Designer with all relevant information for the health and safety file:
- make sure sites are secure;
- display the F10 notification and site rules;
- make sure all workers on site co-operate to ensure the health and safety of construction workers and others who may be affected by their work; and
- report any obvious risks.

#### As the Principal Designer we will:

- advise and assist the Client with their duties;
- plan, manage, monitor and co-ordinate the pre-construction phase;
- ensure the design team, where reasonably practicable, eliminate, reduce and control risks to an acceptable level;
- ensure foreseeable risks are identified;
- ensure everyone working on the pre-construction phase co-operates and effective communication is established;
- identify, collect and pass on pre-construction information;
- liaise with Principal Contractor and share information that may affect the planning, monitoring and co-ordination of the construction phase and also regarding on-going design;
- prepare the health and safety file; and
- report any obvious risks.

#### As contractors we will:

- plan, manage and monitor our workers;
- check competence of all their appointees and their workers;
- make sure our employees are adequately trained to carry out the work required;
- provide information to all our workers;
- comply with part 4 of the regulations;
- make sure there are adequate welfare facilities for the workers on site;
- make sure all workers have the skills, knowledge and experience to undertake the work in a safe manner;
- co-operate with Principal Contractor in planning and managing work, including reasonable directions and site rules;
- provide information needed for the health and safety file;
- inform Principal Contractor of problems with the Plan; and
- Inform Principal Contractor of reportable accidents, diseases and dangerous occurrences.

#### Health and safety aims and objectives

We recognise the importance of having good health and safety practices that meet legal and company requirements.

Our aim is to ensure all CDM sites meet a satisfactory standard of health, safety and welfare. It is vitally important that site teams take ownership of health and safety and are held accountable for any breaches that are life threating or put WDH at risk of enforcement action.

To ensure health and safety standards are met the following monitoring arrangements will be undertaken.

The Capital Works team sites will receive a monthly inspection and a six monthly site audits, sites are required to achieve a minimum target of 90%.

Technical Services will receive a minimum of three inspections each quarter covering WDH work activities; sites are required to achieve a minimum target of 85%.

Partner's schemes which extend longer than three months will receive quarterly site inspections, in the main these inspections will be announced with a number of unannounced each financial year; sites are required to receive a minimum target of 85%.

All inspections and audits will be conducted by a member of the Health and Safety or Compliance team, with some visits accompanied by the trade unions. A documented inspection and audit report will be produced along with a corrective action report. The corrective action report will advise how to comply with the non-conformances identified during the inspection and audit.

Where action is not completed following the corrective action report, or WDH are not informed as to why the contractor or partner feels action is not required, then a WDH improvement notice will be issued. The improvement notice will detail the breach and any corrective action required and provides a timescale.

If a contractor or partner fails to deal with the corrective actions identified in the Improvement Notice, and within the timescales, a WDH Prohibition Notice will be issued. The Prohibition Notice will prevent the contractor or partner from carrying out the activity identified in the Prohibition Notice, until such time as the action identified has been completed. This may also result in us not considering the contractor or partner for future contracts.

These inspections and audits are aimed at raising health and safety standards and therefore reducing the number of accidents.

## 5.8 Setting up sites

The provision of welfare facilities would be addressed in the Construction Phase Plan in line with the CDM Regulations 2015. When planning welfare provisions, we will consider:

- works to be carried out and the health risks associated with it;
- the project size and complexity;
- the duration and number of different locations; and
- the number of people who will use them.

The Construction Phase Plan shall be on site from day one of the site starting and shall be sufficiently developed for the initial stages of the contract. The plan shall be developed as the contract progresses.

The welfare provisions at fixed construction sites shall be established before the works start and includes as a minimum the following:

- washing facilities including soap, towels or dryers;
- sanitary conveniences (male, female and disabled);
- drying room;

- wholesome drinking water, where possible supplied direct from the mains;
- rest facilities;
- means of warming food; and
- hot and cold running water.

All facilities will be maintained to a high standard and cleaned regularly.

All compounds shall be adequately fenced wherever possible and signage erected. Offices and rest rooms shall contain all necessary statutory notices.

The provision of welfare facilities at transient construction sites shall be provided by either a satellite compound or mobile welfare unit.

The satellite compound will include static units which contain all the above. If it is not possible to locate a satellite compound, mobile welfare units will be utilised. Mobile welfare unit will provide all the facilities as detailed in the HSE Construction Information Sheet No 59 and include a rest area and seating, toilet, drinking water, washing facilities and means of heating both water and food.

Where there are isolated properties, the first step will be to seek the property owner's written permission (before the works start) to use their toilet and hand washing facilities. If this is not available chemical toilet units will be provided at each property, complete hand washing facilities. In these circumstances it will be considered acceptable for operatives to eat within their vehicles, but only if these are kept in a suitable state of cleanliness. Drinking water shall be provided by means of a five litre container for each person, provided fresh each working day. If there is no other hand washing facilities available, these will be provided by means of waterless antibacterial hand wash. Wherever WDH facilities are available in the local area, these should be made available to transitory and mobile workers, however these are not to be used as a substitute for onsite welfare facilities.

A copy of the F10 emergency numbers and any other critical information will be held by each work team.

## 5.9 Temporary works co-ordination

Temporary works is defined in BS5975:2019 'code of practice for temporary works procedures and permissible stress design of false work' as those parts of the works that allow or enable construction of, protect, support or provide access to, the permanent works and which might or might not remain in place at the completion of the works. Temporary works include, but not limited to:

- earthworks trenches, excavations, temporary slopes and stockpiles;
- structures formwork, false work, propping, facade retention, needling, shoring, edge protection, scaffolding, temporary bridges, site hoarding and signage, site fencing, coffer clams; and
- equipment / plant foundations tower crane bases, supports, anchors and ties for construction hoists and mast climbing, working platforms (MEWPS), ground works to provide suitable locations for plant erection, such as mobile cranes and piling rigs.

We shall have access to a competent Temporary Works Co-Ordinator (TWC) and have in place effective arrangements for controlling risks arising from the use of temporary works.

We shall adopt the following temporary works procedure:

- formal appointment of a TWC;
- preparation of an adequate design brief;
- completion and maintenance of a temporary works register;
- production of a temporary works design (including a design risk assessment and a designer's method statement where appropriate);
- independent checking of the temporary works design;
- issue of a design / design check certificate, if appropriate;
- pre-erection inspection of the temporary works materials and components;
- control and supervision of the erection safe use. Maintenance and dismantling of the temporary works procedure to:
  - check that the temporary works have been erected in accordance with the design and issue a formal 'permit to load' where necessary; and
  - confirm when the permanent works have attained adequate strength to allow dismantling of the temporary works and issue a formal 'permit to dismantle' where necessary.

## 5.10 Visits by enforcing authorities

Sites can be visited by a variety of statutory bodies such as the HSE, Environment Agency and Environmental Health. These visits can be unannounced or arranged.

- Where visits or investigations are carried out by enforcing officers, employees shall co-operate fully.
- Such visits shall be notified to the Health and Safety team.

## 5.11 Scaffolding

- To be erected in accordance with our Guidance on Planning, Erection, Dismantling and Maintenance of General Purpose Scaffolding on Refurbishment and New Build Schemes.
- Scaffolding to comply with the standards set out within NASC Guidance document TG20:21 and BSEN 12811-1 Guide to Good Practice for Scaffolding with Tube and fitting.
- Scaffold erection, alteration and dismantling shall be subject to risk assessment and method statement.
- Scaffolding shall be erected only by those who hold a current Construction Industry Scaffolder's Record Scheme Card (CISRS).
- Scaffolding shall be suitable for the purpose for which it is intended.
- Scaffolding shall be made of good strong sound materials and checked before
  use by the scaffolder. Tubes shall not be split, cracked, rusty, bent or distorted,
  and the timbers used for boarding shall be of the right type.
- Where there are any extensive or unusual scaffold conditions, the HSM shall be consulted.

- All scaffolds shall be straight and square. Standards shall be placed on a base plate and, if necessary, also on a timber sole plate to make sure there is a firm foundation.
- Scaffolding shall only be erected on firm ground, away from overhead obstructions and excavations.
- A competent person shall inspect the scaffolding before being taken into use for the first time, after any substantial addition, dismantling or other alteration, after any event likely to have affected its strength or stability, and at regular intervals not exceeding seven days since the last inspection. All inspections shall be recorded.
- The scaffolding contractor shall give to the site manager a handover certificate once the scaffold is complete. The site manager shall inspect the scaffolding with the contractor to check for any faults before accepting the hand over certificate.
- On receipt of the hand over certificate details shall be entered in the inspection register. Hand over certificate to be in accordance with National Access and Scaffolding Confederation Guidance Note SG35 Hand Over of Scaffold Structures.
- Site activities shall not be undertaken on the scaffolding until the Site Manager is satisfied with the standard of scaffolding.
- Only competent persons shall carry out alterations to any scaffold.
- Working platforms shall only be used for the purpose they are intended and shall not be over loaded which could affect its safe use.
- Guardrails and toes boards shall be fitted to any exposed edges of working or access platforms.
- All working platforms and decking shall be closely boarded to their full width and free from tripping hazards. Where scaffold boards overlap, then bevelled strips shall be used to reduce potential tripping hazards. The width of the working platform shall be suitable for the activity being carried out, for example five boards wide (1050 millimetres) for bricklaying.
- Boards must be supported every 1.2 metres and comply with TG5:18 and BS2482:2009 specification for timber scaffold boards. Boards to be free of defects and warped boards to be replaced.
- Ledger bracing shall be fitted as required. Putlog or single couplers shall only be used on scaffolding that does not have to hold a lot of weight.
- Platforms boards shall be supported (a maximum span of 1.2 metres and a maximum overhang of 150 millimetres for 38 millimetre boards).
- Ladders shall be in good condition, secured at the appropriate angle and extend 1.05 metres above the stepping off point; ladders to the first lift shall be removed from the scaffold at the end of each working day.
- Loading towers are classed as special structures and a design drawing shall be provided. Suitable gates shall be provided and used on the loading side; preferably the up and over type shall be used.
- Ties shall be fitted as the scaffold is put up and be in line with current technical guidance. Where ties cannot be provided, the method used to support the scaffold shall be recorded. Where scaffolds are fitted with sheeting, tarpaulins and so on these will be under more stress due to wind pressure and shall need more ties.
- Tube joints in bays or lifts shall be staggered and as close to the standard connection as possible.

- Swivel couplers shall be used for standard (upright) bracing, face bracing and the splicing of face bracing joints.
- Standards positioned near doorways and or walkways shall be suitable protected. All rough or cut edges and exposed bolts and fixings and so on to be protected with plastic caps.
- Appropriate warning signs shall be erected on scaffolding that is not suitable for use, access onto the platform shall be denied.
- The site managers shall inform the HSM immediately of all unauthorised access onto the scaffold by third parties.
- All scaffolds shall be checked at the end of each working day to make sure the platform is left in a safe condition and children cannot climb onto them.
- Persons working on or in the vicinity of scaffold shall wear safety helmets.
- All scaffolding will be erected or dismantled in line with SG4:15 Preventing falls in Scaffolding Operations.

Refer to Construction Health and Safety Policy.

#### 5.12 Mobile tower scaffolds

- Mobile towers shall be erected by trained and competent persons and an inspection report completed before use.
- Mobile towers shall be erected in line with the manufacturer's recommendations (maximum height base width ratio and outriggers fitted).
- Mobile towers shall be suitable for the purpose and made of sound materials.
   Towers shall be checked for defects before erecting.
- A check for overhead electricity cables and other obstructions shall be carried out before the tower is erected.
- Mobile towers shall be erected on stable ground of sufficient strength capable to support the structure and load.
- Where possible, the tower shall be tied to the structure using secure points.
   This applies especially in windy or exposed conditions. Towers shall not be used in adverse weather conditions.
- Access onto the working platform shall be by a ladder fitted to the inside of the tower which is fixed to the narrowest side. Frame members shall not be used (unless specifically designed as a ladder) for climbing the tower.
- Casters or wheels, if fitted shall only be used on level ground and fitted with brakes that shall always be used while the tower is stationery.
- Tower's erected outside occupied properties shall be removed each day to prevent unauthorised access.
- When moving a tower, no person(s) or loose materials shall be on the platform.
   When moving the platform pressure shall be applied at or near the base of the tower.
- Incomplete towers shall be signed 'incomplete' and not used.

## 5.13 Safety decking

- Use of safety decking shall be subject to risk assessment.
- Safety decking shall be installed, used and dismantled in accordance with manufacturer's instructions.
- Safety decking shall be installed and dismantled by trained competent contractor.

- Handover certificate shall be provided on completion of the installation; managers are responsible for checking the installation prior to attempting the handover certificate.
- Safety checking shall be inspected prior to first use, following inclement weather and at seven day intervals. Results of inspections shall be recorded in the inspection register.

## 5.14 Mobile elevating work platforms

- The term mobile elevating work platform covers pedestrian controlled, self-propelled power operated mobile elevating work and access platforms.
- Mobile elevating work platforms shall be used as a temporary working platform which can easily be moved from one location to another.
- When using a mobile elevated work platform, we shall comply with the Lifting Operations and Lifting Equipment Regulations 1998.
- Only trained and authorised people shall be permitted to use work from this equipment.
- Equipment shall be checked before use and operated in line with the manufacturer's instructions.
- Electrical supplies shall be safe and connected to the main supply in an approved way by a competent person.
- Where possible, all movement controls shall be operated from the platform.
   Where this is not possible clear communication between workers shall be established.
- Emergency stop isolation switches shall be clearly marked, and workers using the equipment shall be informed of the emergency procedures.
- The safe working load specified by the manufacturer shall not be exceeded.
   The safe working load shall be displayed on the equipment together with maximum number of persons.
- Checks shall be carried out before use to make sure there are no obstructions, especially overhead cables, in the areas where the platform is to be taken or used.
- Safety devices shall be checked to make sure they are fitted and working correctly.
- Mobile elevating work platforms shall only be used on level firm ground.
   Where rough-terrain equipment is used, manufacturer's guidance on ground support requirements shall be followed.
- Clear areas shall be provided around the equipment, warning signs, barriers, cones and so on shall be used.
- The equipment shall not be used in wind speeds exceeding those specified by the manufacturer.
- Where it is not possible to make full use of outriggers necessary arrangements shall be made to keep the equipment stable.
- Good visibility and lighting shall be provided whilst work is being carried out.
- Safety harnesses shall be worn at all times and fixed to designated anchor points.
- Where there is a danger of tools being dropped by the operator from the platform, pedestrian access beneath the platform shall be prevented.
- Platforms that are not in use or unattended, shall be secured at ground level.

- Mobile elevating work platforms shall not be used as:
  - jacks, props, ties or supports;
  - primarily for the transfer of goods or materials;
  - as a crane or lifting appliance;
  - platforms shall only be used for the work they are intended for; and
  - safe access onto the platform shall be provided at ground level.

## 5.15 Soft landing systems (SLS)

- SLS should only be used where it is not practical to use other fall prevention methods such as platforms.
- SLS to be positioned by suitably trained people.
- Manufacturer's instructions and guidance to be followed.
- SLS shall be closely packed and clipped together.
- SLS to be subject to daily and weekly inspections. Inspections to be recorded in the Provision and Use of Work Equipment Regulations (PUWER) register.
- Multiple stacking shall be instigated where manufacturers or suppliers guidance specifies
- Fire retardant SLS to be used.

#### 5.16 Roof work

- All work at height shall be preceded by the submission of a risk assessment and specific method statement detailing how falls of persons or materials shall be prevented.
- Where new roofs are constructed adequate protection shall be provided. Safety nets, soft landing systems, scaffolding and so on shall be considered for use.
- Appropriate edge protection shall be fitted to prevent materials, tools and so on falling from the roof area.
- Where safety nets and soft landing systems are used these shall be manufactured and erected to the requirements of the European Standard, and shall be suitable for the purpose in which they are used.
- Safety nets shall be overlaid with an appropriate fine debris mesh which shall offer protection to those who work or pass below.
- Where safety nets and harnesses are used a test certificate shall be provided and regular inspections carried out.
- Suitable barriers shall be erected around fragile materials on the roof, where this
  is not possible, crawling ladders or boards shall be used to cross these
  materials. Relevant warning notices, such as 'fragile roof' and 'hole below' shall
  be displayed.
- Work shall only take place if the weather conditions are suitable, the effects of high wind, rain, ice, snow and so on shall be taken into account.
- All personnel working on, near or below work that is being done on the roof shall wear safety helmets where directed to do so in the risk assessment / method statement.
- Suitable equipment shall be used to move tools and materials to and from the roof area.
- Materials that are being stored on the roof before use shall be spread out so that no part of the structure is overloaded.

- Harnesses shall be used as the last resort. All personnel undertaking harness work will be trained and competent in the use and inspection of this equipment
- All inspections shall be recorded.

Refer to Working at Heights Policy.

### 5.17 Entry into confined spaces

- Work in confined spaces shall be subjected to risk assessment.
- Set procedures shall be agreed before work starts and, if necessary, a permit to work shall be issued.
- Only suitably trained and authorised people shall be allowed to enter confined spaces, permits shall be utilised.
- Young persons are not permitted to work in confined spaces.
- All necessary equipment shall be made available and checked before entry into a confined space, for example, gas monitor, harness, breathing apparatus, resuscitators, lamps, protective clothing, first aid kit, barriers, winch and air horn.
- Safe working procedures shall include the use of suitable communication systems such as two way radios for use in emergencies.
- Safe working procedures such as using lifelines, checking the depth and direction of the flow of water and making sure there is clear communication between team members shall be required.
- Hazardous substances such as petrol, diesel or LPG powered equipment shall not be used in confined spaces. In addition, naked flames are strictly prohibited.
- Electrical equipment shall not be used in confined spaces unless authorisation has been obtained.
- Weather conditions shall be checked before entry into sewers because storms can cause rapid rises in water levels.
- Stihl saw, grinders and so on, shall not be used in confined spaces.
- Working areas shall be well ventilated by opening manholes above and below the point of entry. Suitable barriers shall be positioned around the manholes if necessary.
- Any cut, scratch or graze shall be protected by waterproof dressing before entry into a confined area.
- When working in areas where rats may be present operatives shall carry a Leptospirosis card at all times. Where necessary it shall be shown to a doctor or to a hospital because of illness.
- Gas monitors shall be checked before use and lowered into the confined space to test for hazardous atmospheres.
- Lifelines attached to a harness shall be used where necessary. In addition, step irons and rungs shall be checked before entry.
- Tools and equipment shall be lowered into the void by using a line to make sure both hands remain free for climbing up and down. If the alarm sounds, the escape set shall be used (if needed) and the area will be vacated quickly and calmly.
- Suitable PPE shall be worn at all times and any areas of skin that may come in contact with sewage must be protected and covered.

- In the event of a collapsed injured person, steps shall be taken to make sure the confined space is vacated immediately, and the emergency services shall be informed immediately.
- Where manhole covers have been removed these shall be replaced after use.

#### 5.18 Fire

Warning notices are displayed detailing action to be taken and escape routes. The emergency procedure is as follows.

#### On discovering a fire

- 1. Raise the alarm.
- 2. Fight the fire with an appropriate extinguisher if it is safe to do so and you are trained in the operation of a fire extinguisher.
- 3. If the fire is not immediately extinguished, leave the building, closing all doors and windows if safe to do so.

#### Action on hearing the alarm

- 1. Switch off all electrical and gas supplies, if this is part of your designated role.
- 2. Close doors and windows if safe to do so.
- 3. Leave by the nearest safe exit.
- 4. Assemble at the designated assembly point.
- 5. **Do not re-enter the building** until told it is safe to do so by the Fire Brigade or senior person present.

## 5.19 Smoking

We are a no smoking company. Smoking is prohibited in all company buildings and vehicles. The Smoke Free Regulations 2007 requires us to make sure public areas within our premises are designated as No Smoking Areas. Signs will be displayed in buildings and vehicles, all our employees must make sure they and others comply with the legislation.

Refer to Fire Safety Policy and Fire and Evacuation Procedures.

## 5.20 Manual handling

The **Manual Handling Operations Regulations 1992** as amended (MHOR) place duties on employers to take steps to prevent injuries caused by manual handling operation.

Manual handling operations means any transporting or supporting of a load (including lifting, putting down, pushing, pulling, carrying or moving by hand or bodily force). A load includes people and animals as well as inanimate objects.

Many manual handling injuries are cumulative rather than attributable to a single incident. A full recovery is not always made; the result can be physical impairment or even permanent disability.

All our employees working in high-risk activities will attend the mandatory training in manual handling. This training will be delivered by the Health and Safety team.

All new employees will receive information on manual handling at induction.

Refer to Manual Handling Operations Policy.

#### 5.21 Asbestos

The Control of Asbestos at Work Regulations 2012 extends the requirements to control the risks to most operations where asbestos fibres could be released and includes monitoring and laboratory analysis.

The Control of Asbestos at Work Regulations 2012 places a legal duty on employers to prevent exposure of its employees to asbestos, or if this is not possible, to reduce it to its lowest level. There are additional duties on all those who have maintenance and repair responsibilities for any part of the premises.

The regulations require mandatory training for anyone liable to be exposed to asbestos fibers at work. This includes maintenance workers and others who may come into contact with or who may disturb asbestos as well as those involved in asbestos removal work. We will provide training to all employees who would encounter asbestos as part of their work; we will also provide specific practical training for our employees on the removal of asbestos not covered by the licensing regulations.

Once trained these persons must take the actions necessary to enable the employer to comply with these requirements.

Refer to Asbestos Safety Policy.

## 5.22 Work equipment

Employees who have been trained, evaluated and recorded as competent will only operate specified work equipment. When not in use, this machinery will be isolated and locked off and all other equipment switched off. Where applicable, equipment should be unplugged at the mains socket. Apprentices and young persons, may be subject to additional restrictions, as set out in the relevant risk assessment and method statement.

# Unauthorised users will be liable to disciplinary action, which may result in dismissal.

Guards are fitted and maintained to protect against injury, they must not be removed, or interfered with in any way that may render them inefficient or inoperable. All guards must be tested for correct functioning before and after use. The designated manager will keep a record. We will assess vibration levels and noise levels of equipment as required by the Control of Vibration at Work Regulations 2005 and the Control of Noise at Work Regulations 2005.

Use of some work equipment may contribute to respiratory diseases as a result of dust generated from the work process.

There are three main types of dust that are hazardous to health:

- silica dust which is found in many construction materials such as concrete and mortar and is broken down into very fine dust (respirable crystalline silica) during many common tasks such as cutting, drilling and grinding;
- 2. non-silica dust is found in gypsum, cement, limestone, marble and dolomite; and
- 3. wood dust comes from two main forms, softwood and hardwood.

We are committed to preventing the following dust related diseases:

Lung cancer.

Chronic Obstructive Pulmonary Disorder.

Silicosis.

Asthma.

Managers should be aware that high levels of dust can be created by one or more of the following.

- Equipment using high energy tools such as cut off saws, grinders, wall chasers, drills and grit blasters produce a lot of dust in a short time.
- Work method dry sweeping can make a lot of dust when compared to vacuuming or wet brushing.
- Work area the more enclosed a space, the more dust will build up.
- Time the longer you work the more dust will be generated.

We will implement the following arrangements to eliminate and reduce the risk of exposure to respiratory dust.

- Managers are to conduct a risk assessment to identify the risks and the need to avoid creating dust.
- Use of different methods of work should be considered such as a Paslode nail gun rather than a drill or use of a block splitter rather than a cut off saw.
- Managers should consider a combination of water suppression and on tool dust extraction systems. HEPA (high-efficiency particulate air) filters to be used in all dust extraction systems.
- Screening off the work area to avoid unnecessary exposure to those working in the vicinity or passers-by should be considered.
- Warning signs should be posted to inform others of areas that may be contaminated with silica dust.
- Wearing of disposable protective equipment and clothing and good hygiene standards maintained.
- Prohibiting of eating and drinking in the work area.
- Implementation of wet sweeping.
- Use of suitable respiratory equipment and those using to be face fit tested.
- Work equipment should be fit for purpose and those using the equipment to be appropriately trained.
- Work equipment should be used and inspected in accordance with manufacturer's instructions. On construction sites, work equipment should be inspected weekly and details recorded in the PUWER register.

 Operators of the equipment are required to inspect the equipment prior to use, defective equipment must not be used and defects must be reported to their line manager.

#### 5.23 Maintenance

A planned, preventative maintenance programme for all work equipment will be established using supplier and manufacturer recommendations. The programme will be set up and maintained in conjunction with a contract engineer, who will keep the necessary records of planned and breakdown maintenance. At suitable periods, the maintenance programme will be reviewed and adjusted as necessary.

#### 5.24 Chain saws and cut off saws

- Chain saws and cut off saws shall be subject to risk assessment.
- Saws shall be used in line with manufacturer's instructions and guidance.
- Saws shall be used by competent and trained persons.
- A visual inspection of the working area shall be carried out before use, identifying items such as overhead power cables, pedestrian routes and so on.
- Appropriate PPE such as ear defenders, eye protection, forestry mesh visor, gloves, safety footwear, ballistic nylon trousers shall be used when using chain saws or cut off saws.
- Saws shall only be used where effective ventilation can be achieved, preferably outdoors.
- Members of the public and / or other employees shall be physically prevented from accessing areas where chain saw work is being carried out. This shall be achieved with the introduction of physical barriers and / or warning signage.
- Chain saws shall be removed from the working area when not in use.
- If using the chain saw whilst working at height a suitable safe working platform shall be used, ladders must not be used for this purpose.
- Re-fuelling of saws shall be carried out outdoors, with any spillages being cleaned up in line with the company environmental policies.
- Saws shall not be left anywhere that may potentially cause an obstruction, such as on a public footpath.
- Saws shall be stored in appropriate lockable, well ventilated containers which must be properly signed.
- If saws are to be transported, they shall be secured to make sure they cannot overturn or be damaged.

## 5.25 Woodworking machines

- Woodworking machines shall be subject to risk assessment.
- Only trained and competent operatives shall be authorised to use woodworking machines.
- Machines shall be fitted with appropriate and effective stopping and isolating devices.
- Woodworking equipment shall be subject to regular and recorded maintenance inspections and tested, on an annual basis. Weekly inspections shall be carried out on equipment used on construction sites; inspections shall be recorded in the PUWER Register.

- Pre user visual checks shall be carried out by the person using the equipment.
   Any faults shall be reported to line management immediately and the equipment must be marked 'Faulty Do Not Use'.
- Appropriate PPE such as ear defenders, eye protection, gloves, dust masks shall be used where risk assessment identifies the requirement.
- All loose clothing such as ties, overall sleeves, scarves and so on, shall be secured before use. All machinery shall be used in line with manufacturer's instructions and guidance.
- Where possible, machines shall be used outdoors in well ventilated areas.
- Where necessary, appropriate dust extraction units shall be fitted to machinery to prevent excessive amounts of dust being released into the air.
- Users shall make sure that appropriate guarding is in place before use.
- Machines shall not be used in poor or reduced lighting.

## 5.26 Cartridge tools

- Cartridge operated tools shall be subject to risk assessment.
- Only trained and competent operatives shall be authorised to use cartridge tools, certificates of compliances shall be required.
- Cartridge tools and equipment shall be used in line with manufacturer's instructions for use.
- Equipment shall be subject to pre-user visual inspections to make sure all guarding is in place.
- Appropriate PPE such as safety helmets, ear defenders and eye protection shall be worn where necessary.
- Tools and cartridges must not be left unattended and shall be returned to their storage place when not in use. They shall be kept in a lockable container.
- Unspent cartridges and used cartridges shall be disposed of safely in line with current regulations.
- Cartridge tools shall not be used in the vicinity of flammable vapours or gasses such as LPG.

#### 5.27 Abrasive wheels

- Abrasive wheels shall be subject to risk assessment.
- Only trained and competent personnel shall be authorised to use and change the abrasive wheels.
- Equipment shall be subject to regular and recorded inspections and tests.
   Weekly inspections shall be carried out on equipment used on construction sites, inspections shall be recorded in the PUWER Register.
- Pre user checks shall be carried out by operatives before use to make sure equipment is in good working order and that all guarding is in place.
- Appropriate PPE such as eye protection, ear defenders and a dust mask shall be used when using the equipment.
- Loose clothing such as ties or scarves shall not be worn when using abrasive wheels.
- Where possible equipment shall be used outside or in well ventilated areas.
- Members of the public shall be physically segregated by means of barriers or similar from entering works where abrasive wheels are being used.

- When using on materials that are likely to create dust, a suitable water suppression or extraction system shall be used. The water suppression or extraction system must be checked prior to use and at regular intervals during its use
- Abrasive wheels should not be held above head height as this may increase the
  potential for upper body injuries and / or strains.
- Appropriate safe working procedures identified by relevant COSHH assessments shall be followed when re-fuelling equipment.
- All dust and debris must be cleared away at the earliest opportunity and / or once work is complete.
- Abrasive wheels shall only be used when a firm safe working area is provided.

## 5.28 Electricity

The use of all items of electrical equipment, including any which may have been brought from home, are subject to the requirements of the Electricity at Work Regulations 1989.

To make sure that all items of portable electrical equipment are properly maintained, we operate formal inspections of such equipment, this is carried out in house by a qualified electrician who will, at the same time, inspect fixed electrical systems within premises in line with British Standards and Institute of Electrical Engineers Guidance Notes.

On construction sites, where possible, cordless tools and equipment shall be used.

Only 110v equipment should be used on construction sites and the equipment must be PAT (portable appliance testing) tested on a quarterly basis.

All portable tools will be subject to regular maintenance and inspection including tests carried out by a competent person.

All electrical tools are to be disconnected and made safe when not in use.

Electrical equipment will not be used outside in adverse weather conditions such as heavy rain or snow.

Refer to Electrical Safety Policy.

#### 5.29 Hazardous substances

Some of the substances used by the WDH are hazardous to health as classified under the COSHH Regulations 2002. Managers controlling work which involved the use of substances, including some substances used in offices, are expected to make sure that an assessment of the use of the substance has been undertaken and that all necessary precautions have been taken to provide for the safe use of the substance.

#### We operate a controlled list of products available for use.

We use an approved product list; this enables a control of substances used within the organisation. Employees are, and will continue to be, instructed in recommended safe handling and disposal procedures. Protective clothing and safety equipment is available where necessary together with instruction and training in correct fitting, use, storage and maintenance.

Refer to Control of Substances Hazardous to Health (COSHH) Policy.

#### 5.30 Display screen equipment (DSE)

Extensive and increasing use of display screen equipment and the conditions under which they are operated is controlled by the Health and Safety (Display Screen Equipment) Regulations 1992. Our policy covers workstation layout, working patterns, training and special provisions for health and safety.

No person should use a piece of display screen equipment without consulting the policies and checking that the workstation layout is suitable for them and, if not, making appropriate adjustments.

Employees who are designated as DSE users are offered free eyesight checks through a scheme administered by the Health and Safety team.

Refer to Display Screen Equipment Policy.

#### 5.31 Lone working

There are many situations where employees are required to work alone or in isolation. This may constitute all or a significant part of their working time. Hazards and risks that particularly apply to lone workers are assessed and appropriate control measures are implemented. This includes:

- provision of a lone worker monitoring device or mobile phone App;
- means of communication;
- information and training;
- emergency and accident procedures;
- suitability of work equipment;
- action in the event of violence, risks from animals and criminal activity; and
- safe systems of work.

Some situations or locations will require the presence of two or more operatives, such as:

- working in multi storey units;
- interview with a potentially violent person; and
- jobs requiring the movement of heavy loads.

Refer to Lone Worker Policy.

#### 5.32 Training

Suitable and sufficient information, instruction and training will be given to all employees and other persons who may be affected by WDH's undertaking. Employees (full and part time) and agency employees will be provided with training on recruitment, on being exposed to new or increased risks and this will be repeated as appropriate.

Visitors will be given appropriate information on arrival at WDH premises.

All our employees who are required to work on our construction sites covered by the CDM Regulations must hold a relevant CSCS card for their particular trade or profession. Where CSCS cards are not applicable, due to job role, then the employee must hold a current CITB Health and Safety Awareness (HAS) certificate.

The minimum requirement for both skill and health and safety competence to work on construction sites is to hold a relevant CSCS or affiliated scheme card.

#### **Contractors**

- Contractors will complete a health and safety competency questionnaire and successful companies will be entered on the procurement database.
- All contractors' employees CSCS cards or equivalent will be reviewed at site induction.
- Where no CSCS or equivalent card is held, proof of competence and working towards the relevant card will be required.

#### **Employees**

- All employees' CSCS cards or equivalent will be reviewed at site induction.
- Where no CSCS or equivalent card is held, proof of competence and working towards the relevant card will be required.
- Any training required to attain the relevant card will be identified and arranged by the Learning and Development team.

Where work is carried out on a construction site covered by the CDM Regulations then all workers, visitors, contractors will be provided with induction training on site specific health and safety factors applicable to that site. This training will be carried out before they are allowed to start work.

#### Contents will include:

- any site rules;
- permits to work systems (where applicable);
- traffic routes;
- security arrangements;
- arrangements for PPE including what are needed where to obtain it and areas where mandatory PPE should be worn;
- housekeeping and materials storage;
- welfare facilities;
- emergency procedures including action to take in the event of a fire, escape routes, assembly points, responsible people and use of any fire-fighting equipment;
- arrangements for first aid;

- arrangements for reporting accidents, incidents, near misses and hazards;
- details of training on toolbox talks; and
- information around individual responsibilities for health and safety whilst on site.

For information regarding CSCS cards go to: https://www.cscs.uk.com/

For all CPCS categories go to: www.cskills.org/centreandschool/CPCS

For occupations covered by CSCS go to www.cscs.uk.com/occupations

#### 5.33 Communication

It is essential that all employees are aware of safety measures, systems and practices in force in WDH. Managers are responsible for informing, instructing and training their employees. The Health and Safety team may be called upon to carry out some training and they will keep the relevant records.

In addition, the safety representatives who sit on the Technical Services Safety Groups and our Health and Safety Management Group are responsible for passing information to employees, up, down and across the management structure. It is stressed that the Safety Representatives are not responsible for managing health and safety.

Health and safety notice boards are sited at key points at the different offices and will display various articles that affect employees. A Health and Safety Handbook is available electronically and in hard copy. Also, a web page is available on the Employee Hub, which carries all health and safety policies and information.

## 5.34 Health and Safety Management Group

The Health and Safety Management Group, chaired by the Director of Organisational Development has been established to engage representatives of both management and recognised trade union representatives. The group will develop and implement measures to ensure the health and safety at work of employees and of customers who are affected by our activities. The group will monitor the health and safety performance of any organisations engaged to carry out work on our behalf.

The committee will meet a minimum of four times a year to discuss and make recommendations on strategic health and safety issues to management. Minutes of the committee will go to the Corporate Management Team (CMT) and the Board. In addition, they will be circulated throughout the organisation through the Employee Hub and form part of team briefing / newsletters where appropriate. Information and minutes from the Health and Safety Management Group will be reviewed at the Governance Committee.

#### 5.35 Strategic Compliance Group

The Strategic Compliance Group chaired by the Executive Director of Investment has been established to ensure that WDH meets all the regulatory and legislative requirements relating to property compliance functions. The Group will receive formal performance reports from the responsible persons and evidence of audits from the compliance team and contractors. The Group meets on a Bi-annual basis. The attendees are listed below:

Executive Director of Technical Services
Executive Director of Investment
Director of Organisational Development
Director Technical Services
Director of Corporate Services
Health and Safety Quality Assurance Manager
Building Safety and Property Compliance Manager
Health and Safety Manager
Compliance Manager
Operations Manager Mechanical and Electrical

Information and minutes from the Strategic Compliance Group will be reviewed at the Property Investment Committee.

#### 5.36 Consultation with employees

We will consult with all employees on matters that concern their health and safety. This will include:

- emergency procedures;
- information on risks to health and safety;
- risk control and prevention measures;
- health and safety training; and
- introduction of new procedures, equipment or technologies.

Consultation will be carried out with key employees. These will include trade union safety representatives, management, health and safety groups and employees directly affected by the proposal.

Consultation will be conducted in such a way as to allow employees to gain and assimilate the proposed changes, consider the implications of the change and feedback their comments, thoughts, views and concerns. Four weeks is considered to be the minimum time for consultation starting at the point of posting the consultation document.

As a general rule, consultation will take place during normal working hours.

#### 5.37 Accident reporting

Accidents are to be reported to the Health and Safety team they will then review them and request an accident investigation from the line manager. If the employee is to be absent for more than seven days this should be indicated when reporting the accident, if the manager is unsure the employee will be absent for seven days, they are to make the Health and Safety team aware of this so they can monitor the absence duration. This is to determine whether the accident is reportable under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013.

When an employee reports an injury, managers must determine if the accident occurred at work.

Managers are to thoroughly investigate all accidents; the investigation report should be sent to the HSM without delay.

Refer to the Accident, Incident and Dangerous Occurrence Reporting and Investigation Policy.

#### 5.38 Prevention of violence

We recognise that workers providing services to the public are at some risk of physical assault, threat or verbal abuse. It is committed to both identifying the circumstances leading to a predictable risk and to introducing measures to minimise that risk. There is a policy on the safety of employees.

All incidents of anger, aggression and violence must be reported. Physical violence which results in injury must be reported through the individual's record on Dynamics. Any verbal abuse must be reported as a 'Near Miss' report.

Managers are required to make sure they investigate all incidents of aggression and violence and that all necessary action is taken against the aggressor up to and including termination of tenancy.

Refer to Lone Working Policy and Safety Alert Register Procedure.

#### 5.39 First aid

Trained first aiders are appointed and trained as required. The number of trained first aiders will be maintained at a level which the risk assessment determines but WDH will strive to ensure at least one person who holds a recognised first aid certificate will be provided at each office. The names will be prominently displayed in a number of areas around the office. Signs will be displayed at suitable points and on the health and safety notice board that details:

- name, location and phone number of first aiders; and
- name, location and phone number of doctor (if applicable).

If in doubt, call the emergency services – 999.

Refer to First Aid Policy.

## 5.40 Housekeeping

The maintenance of clean and tidy work areas, toilets and rest areas is of major importance in the avoidance of illness and accident. Routes for access and egress, firefighting equipment, emergency exits and so on. must not be hidden from view or blocked with equipment or stores.

Work areas should be maintained in a clean and tidy manner to avoid the risk of accidents including slips, trips and falls. This extends to trailing cables, litter, open drawers and spills.

#### All employees must:

- keep the work area as clear as possible;
- return equipment to its correct place in a clean and working condition when not in use; and
- clean up spillages as soon as possible, taking into account the nature of the substance spilled and leaving the floors as dry as possible – hazardous substances must be disposed of in a safe and healthy manner.

#### **Employees must not:**

- carry out work in an area congested with other apparatus or articles that would constitute a hazard; and
- allow any trailing leads or cables to be so placed so as to constitute a hazard.

#### 5.41 PPE

PPE required will be issued to individuals at no cost. The individual will be informed, instructed and trained in its fitting, use, cleaning, storage and maintenance. It is the line manager's responsibility to make sure that PPE is worn at all times when required. Individuals should notify their line manager if PPE is lost or damaged to enable a replacement to be provided as soon as possible.

#### Items of PPE include:

- work clothing;
- safety spectacles;
- gloves;

- footwear; and
- hearing protection.

## 5.42 Driving

It is our policy to take all reasonable steps to manage the health and safety of those employees who drive on WDH business. This is to comply with our legal duties as an employer and to demonstrate that it has taken all reasonable steps to introduce safe systems of work. It is for this reason that our policy not only sets out our procedures on work related driving, but details what it expects from our employees; both in terms of complying with relevant legislation and our own standards. These cover a variety of areas including the documentation that we need to see from our own car drivers, as well as basic guidelines on driver health.

Our Chief Executive is responsible for all health and safety of our employees and will make sure suitable and sufficient driver and fleet risks are addressed. This procedure is applicable to privately owned vehicles approved for use on WDH business. Where appropriate, this procedure is applicable to employees driving hired cars.

Further guidance can be obtained from the Driving at Work Owner Driver Policy, and the Fleet Driver Policy.

#### 5.43 Visitors

All visitors must book in and out in the visitor logbook. They must be accompanied by employees, who will be responsible for their health and safety. If visitors are to be allowed free access around the building, they must be briefed on the hazards, precautions and emergency procedures and the employees responsible will issue any required personal protective clothing. This must be recorded and the visitor sign their understanding and compliance when signing into the building. Our employees are responsible for making sure visitors evacuate the building during an emergency.

#### 5.44 Advice

#### Advice in-house can be gained from:

Paula Norton Health and Safety Manager

Phone: 07786 028747

Email: pnorton@wdh.co.uk

Outside of the organisation, advice can be gained from:

**HSE Infoline** 0300 003 1747 **HSE Website** www.hse.gov.uk

## 5.45 Monitoring and review

The HSM will produce detailed accident / incident statistics as determined by the CMT.

The HSM will report any individual accident / incident that require a procedural review to the appropriate Director or Service Director.

Premises inspections will be carried out as required by policy in conjunction with recognised trade union involvement.

Twice yearly fire drills will be held and recorded. Evacuation of premises will be in line with the Fire Evacuation Process.

The completion and review of health and safety risk assessments in all areas of service delivery will be undertaken.

Health and safety will be a standing item on all employee supervision and workplace employee meetings.

Health and safety will be a standing item on all JCCs.

Health and safety training will be included as a core element of the department Training Plan. The focus of health and safety training will reflect the outcome of the monitoring / review across the department.

Management development training will emphasise the need to monitor and review health and safety as a core management activity.

Monitoring and reviewing of health and safety will be incorporated into the reviews of all providers contracted to provide services for us.



# **Vision**

to create confident communities

# **Mission**

to inspire, transform and promote excellence

# **Values**

to be creative, inclusive and work with integrity