

HEALTH & SAFETY POLICY	POL-001 : Rev. 2
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KEY DETAILS	
Policy prepared by	J Morris, John Morris Safety Ltd.
Approved by Board on	4 April 2020
Policy became operational on	4 April 2020
Next review date	4 April 2021

RELATED DOCUMENTS	

CONTENT

1. Policy by John Morris (Attached)
2. Policy Enforcement
3. Policy Revision History

2. POLICY ENFORCEMENT

Any breach of this policy will be investigated by the CDT Board and may result in disciplinary action.

3. REVISION HISTORY

REVISION CONTROL			
Revision	Author	Date	Changes
Rev.0		19.3.2011	
Rev.1		19.3.2012	
Rev.2	John Morris	6.4.2020	Full review and re-write by John Morris.



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REVISED DRAFT COPY ONLY – NOT FOR ISSUE

Section 1



Health and Safety Policy

General Statement of Intent



HEALTH AND SAFETY STATEMENT OF INTENT

As the Chairman of the Board of Trustees I acknowledge the corporate responsibility for the health, safety and welfare of our employees at work and for the protection of other persons against risk to their health and safety out of, or in connection with the activities undertaken by Comrie Development Trust.

Comrie Development Trust is fully committed to meeting its safety, health and environmental responsibilities in terms of complying with relevant legislation. The Board of Trustees, Managers Working Group Leaders and employees shall transmit within their sphere of control and influence, the belief and commitment that safety, health and environmental protection are an integral element of all our activities and is of equal importance to quality of service.

The Board of Directors have a joint responsibility for the implementation of health and safety arrangements. This includes the monitoring and reviewing of the Safe Systems of Work, which are designed to ensure that Comrie Development Trust is meeting its legal obligations and to provide a springboard for Continuous Improvement principles.

All employees, volunteers, contractors and businesses have a legal Duty of Care to ensure that the activities they are undertaking are carried out safely, with due consideration of the risk of harm to themselves or others, and in accordance with the relevant health and safety regulations.

The Office Manager will co-ordinate health and safety documentation for the CDT Office. To assist Comrie Development Trust in achieving these objectives, we have retained the services of John Morris Safety Ltd to act as our Health and Safety Consultant. This will provide access to competent safety advice and assist in the monitoring of our safety arrangements.

For and on behalf of Comrie Development Trust.

Signature:

Name:

Position: **Chairman**

Date: **August 2019**

Record of Annual Review		
Date	Signature	Comments
Aug 2020		
Aug 2021		
Aug 2022		

Section 2



Health and Safety Policy

Organisation Chart & Responsibilities

ORGANISATION AND RESPONSIBILITIES

To ensure the effective implementation of our health and safety policy, the following specific responsibilities have been developed for Comrie Development Trust.

BOARD OF TRUSTEES (BoT)

The BoT have a general Duty of Care for ensuring that Comrie Development Trust fulfils all legal responsibilities. They will ensure that policy objectives are fulfilled and that sufficient resources are made available in respect of health, safety, welfare and environmental protection.

In order to meet their responsibilities the BoT will:

- Accept functional responsibility for the activities of Comrie Development Trust and ensure that health and safety is an integral part of the overall management and working culture.
- Appoint a competent person to assist the BoT in undertaking the measures needed to comply with statutory provisions, as required by Regulation 7 of the Management of Health and Safety at Work Regulations 1999.
- Develop a positive attitude to health and safety amongst employees and resident businesses, by visibly demonstrating commitment to the continuous improvement of the health and safety performance throughout Comrie Development Trust activities.
- Establish, monitor and review an effective Health and Safety Policy and place Health, Safety and Environmental issues as an agenda item at Team Meetings. Any health and safety or environmental pollution incident is appropriately dealt with, reported, investigated and preventative measures implemented to prevent a reoccurrence.
- Ensure procedures to assess risk are established and effective control measures implemented.
- Establish procedures that require Contractors to comply with safe working practices whilst engaged on Comrie Development Trust activities.
- Ensuring, so far as is reasonably practicable, that all procedures, safe systems of work, method statements or Permits to Work are adhered to.

The BoT should ensure that the General Duties of the Health and Safety at Work Act 1974 are complied with. In that:

- Safe equipment and systems are provided and maintained.
- The use, handling, storage and transport of articles or substances are done so safely.
- Adequate information, instruction, training and supervision are provided as is necessary to ensure the safety of employees and others while at work.
- Safe access and egress is provided and maintained and a safe working environment is maintained.
- Adequate facilities are provided and maintained for the welfare of employees while at work.

CDT MANAGERS & WORKING GROUP VOLUNTEER LEADERS

The respective Managers and Leaders have delegated authority and functional responsibility for the activities carried out on behalf of Comrie Development Trust. In order to meet their health, safety and environmental responsibilities the Managers and Working Group Leaders are to:

- Liase with the BoT and other Managers to establish the principles of continual improvement
- Be aware of the Health and Safety at Work Act 1974, Environmental Protection Act 1990 and associated legislation related to their activities.
- Allocate sufficient resources to allow the policies and procedures to be effectively implemented.
- Ensure risk assessments are undertaken for activities or areas where Comrie Development Trust or their working group has responsibility.
- Demonstrate commitment to achieving and maintaining a high standard of safety and environmental performance and accident prevention.
- Ensure any health and safety, or environmental pollution, incident is appropriately dealt with. In addition, provisions are to be available for Managers to report, investigate and introduce preventative measures to prevent a reoccurrence.
- Ensuring that the CDT health and safety policy is explained to employees and they are made aware of their health and safety duties and responsibilities.
- Ensuring, so far as is reasonably practicable, that all procedures, safe systems of work, method statements or Permits to Work are adhered to.
- Maintaining all relevant statutory records and making them readily available.
- Reporting of Accidents, Incidents, Diseases, Dangerous Occurrences, Near Misses and Fire to internal higher authority (BoT).
- Undertaking monitoring and review of process and procedures within their area of responsibility.
- Where deficiencies are identified by the routine monitoring process of respective Managers or Group Leaders they will initiate the necessary remedial action.
- The training needs of employees and volunteers are assessed and addressed, this includes the requirement for induction training for new employees and volunteers.
- The Managers and Leaders decision as to what level of supervision is required will be subject to their assessment of the following:
 - a) Difficulty of the task or operation (routine or unusual nature)
 - b) Any particular hazard associated with the task
 - c) Safeguards or control measures for risk reduction
 - d) Competence, maturity, skill and experience of the individual
 - e) Physical ability of individual
 - f) Workplace environment (remote or unoccupied location)
 - g) Any external factors which may affect the task or the person
 - h) Individuals understanding of the task (including any language barriers)
 - i) Availability and accuracy of information

CDT OFFICE MANAGER

- The Office Manager will co-ordinate the Health and Safety documentation for the CDT Offices.
- The Office Manager, in conjunction with the respective CDT Manager or Working Group Leader, will investigate all incidents, irrespective of injury to ascertain cause and prevent re-occurrence.

EMPLOYEE'S RESPONSIBILITIES

The Health and Safety at Work Act and the Management of Health and Safety at Work Regulations place duties upon employees, at all levels, while at work. These duties include the following:

- To take reasonable care for the health and safety of themselves and other persons who may be affected by their acts or omissions at work
- To co-operate with the employer, so far as is reasonably necessary to enable the employer to meet his or her statutory health and safety duties
- No-one may intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety or welfare
- Any employee that is required to use machinery, equipment, dangerous substances, transport, safety devices or a means of production is to do so in accordance with training or instructions provided by the employer
- Employees must make the employer aware of any serious imminent dangers to health and safety

In addition employees have specific duties under the following:

Control of Substances Hazardous to Health Regulations

- Employee must make full and proper use of control measures

Personal Protective Equipment at Work Regulations

- Make full and proper use of any PPE provided
- Report any damage or defect to PPE to employer
- To return the PPE to proper storage after use

Electricity at Work Regulations

- To co-operate with employer to enable duty to be complied with
- To comply with provisions which are within his or her control

Manual Handling Operations Regulations

- To make full and proper use of any system of work provided

Noise at Work Regulations

- Make full and proper use of personal ear protection when provided by the employer
- Use any other protection measure provided
- Report to employer any defect to protective equipment

VOLUNTEER GROUPS, RESIDENT BUSINESSES & CONTRACTORS

Have a General Duty under the Health and Safety at Work Act 1974 to:

- Take reasonable care for the health and safety of themselves and other persons who may be affected by their acts or omissions at work
- Co-operate with Comrie Development Trust, so far as is reasonably necessary, to enable them to meet their statutory health and safety duties

In addition:

- No-one may intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety or welfare
- Any resident business, working group or contractor that is required to use machinery, equipment, dangerous substances, transport, safety devices or a means of production is to do so in accordance with the manufacturers recommendations, training or instructions.
- Resident businesses, working groups and contractors must make CDT aware of any serious imminent dangers to health and safety
- Provide Comrie Development Trust with any necessary information regarding health, safety and environmental protection associated with their work activities
- Provide specific information required for the Health and Safety File in accordance with the current Construction (Design and Management) Regulations

HEALTH AND SAFETY CONSULTANT

The ultimate responsibility for the health, safety and welfare of employees, and others as a result of Comrie Development Trust undertakings, rest with the employer. However, consultants have a responsibility to provide competent advice.

John Morris Safety Ltd has been appointed to assist Comrie Development Trust in meeting the legislative requirements of the Health and Safety at Work Act 1974 and Management of Health and Safety at Work Regulations.

He can provide advice and assistance to Comrie Development Trust in the form of:

- Procedures/systems to meet legislative requirements
- Accident prevention & accident investigation
- Risk assessments and effective control measures
- Fire risk assessments and fire prevention
- Workplace inspections
- Safety Management Audits
- Auditing contractors and sub-contractors
- Training
- Liaise with enforcing authorities/insurance companies/police/emergency services
- Improving the overall effectiveness of the Health and Safety arrangements

Section 3



Health and Safety Arrangements

Risk Assessments

RISK ASSESSMENTS GUIDE

Employers have an absolute duty to make suitable and sufficient assessment of risk to the health and safety of his employees and other persons who may be affected by his undertaking.

An assessment of risk is a careful examination of the hazards associated with the activities carried out by, or on behalf of, Comrie Development Trust. An assessment of risk identifies the hazards, assess the risks to individuals and considers the control measures. Where significant risk exists findings are required to be documented and reviewed. This assessment should involve communication with the employees, as they may be aware of hazards that may not be immediately obvious to the assessor.

Assessments are carried out by a competent person who should have a good understanding of the tasks to be assessed; they will conduct a hazard identification survey in their respective areas of responsibility. This survey will concentrate on significant hazards which could result in serious injury or have “business loss” implications.

DEFINITIONS

Hazard - Anything with the potential to cause harm.

Risk - Likelihood and consequence of a hazard being realised.

The Health and Safety Executive (HSE) recommend a Five Step approach to risk assessment.

1. Look for the hazards.
2. Decide who might be harmed and how.
3. Evaluate the risks and decide whether existing precautions are adequate or whether more should be done.
4. Record and communicate your findings.
5. Review your assessments.

The principles of this Five Step approach have been developed into the following risk assessment methodology.

To provide a mechanism for you to prioritise the potential risks arising from various work activities you should use the existing Risk Assessment form. An additional form has been recently introduced to help employers identify site hazards. To complete the form the following details should be entered:

Assessment Details

- Activity or location where assessments are carried out
- Name of person carrying out assessment and the person responsible for the activity
- The date the assessments were carried out
- The scheduled review date

Conducting the Initial Risk Rating

- Carry out a Site Survey
- List all hazards associated with the site activities
- Document the effective control measures required to reduce the risks to an acceptable level.

To assist in the hazard identification process a number of sources can be used, for example, appropriate industry standards, manufacturer's recommendations and Approved Codes of Practice. The following are a selection of common hazards:

Slips, trips and falls	Fire
Falls from height	Equipment failure
Contact with a moving vehicle	Unauthorised access
Struck by a falling object/material	Electricity
Hazardous Substances	Contact with a sharp surface/object
Noise	Adverse weather
Manual Handling	Overhead & underground services
Food Poisoning	Contact with moving part
Contact with a hot surface/liquid	Explosion
Injured by an animal	Water Hazards
Lacerations	Traps or Crushing
Contact with a stationary object	Ejections
Vibration	Entanglement
Collapse of structure	Legionella
Asbestos, Mercury or Lead	Operator error

To highlight activities or areas where accidents/incidents occur frequently, examine accident or ill health records. Involve the employees in the risk assessment process as they may know of hazards that you are unaware of. In addition, they are more likely to implement control measures if they were involved in the Risk Assessment Process.

The aim of risk assessments is to reduce risks to a level, commonly described as As Low As Reasonably Practicable (ALARP). However, even after all precautions have been taken some risk usually remains. A decision must be made whether that level of Residual Risk is acceptable.

If it is found that the level of risk is unacceptable you should:

- **Eliminate the hazard**
- **Use physical or engineering controls to reduce the risk at source and provide collective protection in preference to individual protection e.g. Effective edge protection rather than a fall arrest harness when working at height.**
- **Control the person by training, job design, management and, as a last resort, PPE.**

An Emergency Procedure should be established and all site personnel made aware of what actions to take in the event of an emergency situation.

RISK RATING GUIDE

		Severity				
		5 Catastrophic <i>Multiple deaths or total systems loss.</i>	4 Critical <i>Major injury or illness. Major damage.</i>	3 Serious <i>Injury, illness or property damage.</i>	2 Marginal <i>First aid injury or Routine repair.</i>	1 Negligible <i>Very minor. Little consequence.</i>
Likelihood	5 Frequent <i>Likely to occur frequently. Many occasions.</i>	25 Unacceptable	20 Unacceptable	15 Unacceptable	10 Undesirable	
	4 Probable <i>Likely to occur several times.</i>	20 Unacceptable	16 Unacceptable	12 Undesirable	8 Undesirable	
	3 Occasional <i>Some times.</i>	15 Unacceptable	12 Undesirable	9 Undesirable		3 Negligible
	2 Remote <i>Unlikely but possible.</i>	10 Undesirable	8 Undesirable			2 Negligible
	1 Improbable <i>Very unlikely. Assumption that it will never occur.</i>			3 Negligible	2 Negligible	1 Negligible

Risk Rating = Likelihood of Occurrence x Severity of the Consequence

Risk Rating	Level of Risk	Description of Risk	Action
15 – 25	High	Unacceptable	Must be eliminated or moved to a lower Risk Rating level by ALARP principles.
8 – 12	Medium	Undesirable	Further risk assessment required, ALARP principles to apply.
			Can be accepted provided risk is managed, risk associated with hazard already considered ALARP.
1 - 3	Insignificant	Negligible	No further action required.

CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH)

OBJECTIVE

To minimise the risk of ill-health or injury through exposure to harmful substances or material.

ARRANGEMENTS

The Control of Substances Hazardous to Health (COSHH) Regulations require employees to:

- Identify the hazardous substances in the workplace
- Consider the risks these substances present to people's health

No material or substance is to be brought into the workplace without the prior knowledge and approval of the Director.

Comrie Development Trust will establish a "Purchasing Policy" which considers the safest produce as being the most appropriate for the task. In each case the Material Safety Data Sheet (MSDS) will be obtained and the substance will be subjected to a COSHH Assessment prior to being put into use.

A COSHH Substance Inventory will be established to identify all products that have been authorised for use by Comrie Development Trust employees. Only products that appear on the Substance Inventory will be used on site.

Assessing risks from Hazardous Substances in the workplace

The risks associated with the hazardous substances present in the workplace must be assessed. The employer has the responsibility for the risk assessment. They may call on external assistance if it is required.

The person conducting the assessment must have a knowledge and understanding of the process and the requirements of the COSHH regulations. Make use of the existing knowledge within the workplace before deciding whether outside assistance is needed.

Most simple assessments can be carried out in-house:

- gather as much information as you can on each substance and the risks associated with them
- look at information on labels, in suppliers' catalogues and Material Safety Data Sheets (MSDS).

Then assess how these risks relate to the specific circumstances of the workplace.

Consider:

How much of each substance is used and how often?

Larger quantities or substances that are used often will increase the risk of exposure.

How is each substance used?

Are the substances mixed, poured, sprayed, piped, heated, cooled, etc.? The way they are used will determine how you will control exposures.

How could people be exposed and what effect could it have on their health?

Is the substance a solid, liquid, gas, mist or fume? Will the substance damage their skin, lungs, eyes through skin contact, absorption, ingestion, inhalation or injection?

Answering these questions will help you carry out the risk assessment and determine the measures you need to take to protect the health of those people who could be exposed.

Control Exposure

Under the COSHH Regulations eight exposure principles apply. These are:

- design and operate processes and activities to minimise emission, release and spread of substances hazardous to health
- take into account all relevant routes of exposure – inhalation, skin absorption, injection and ingestion – when developing control measures
- control exposure by measures that are proportionate to the health risk
- choose the most effective and reliable control options, which minimise the escape and spread of substances hazardous to health
- where adequate control of exposure cannot be achieved by other means, provide, in combination with other control measures, suitable personal protective equipment
- check and review regularly all elements of control measures for their continuing effectiveness
- inform and train all employees on the hazards and risks from the substances with which they work and the use of control measures developed to minimise the risks
- ensure that the introduction of control measures does not increase the overall risk to health and safety.

The COSHH Approved code of Practice (ACoP) recommends that exposure be prevented by:

- altering work methods so that the task that causes exposure is no longer carried out
- modifying the process to remove Hazardous Substances including by-products or waste
- substituting the hazardous substance with a less hazardous type or form of the substance, e.g. using granules instead of powder to reduce dust levels or a less volatile solvent in a process.

If exposure cannot be prevented, it must be adequately controlled. The hierarchy of control measures can be summarised as follows.

Eliminate

Don't use the hazardous substance or avoid the procedure which causes exposure.

Substitute

Change the material or working practice to one less hazardous.

Enclose

Enclose the hazardous substances or process in a closed system.

Control

Control exposure to the hazardous substance by using one of the following methods:

- *Engineering Controls:* Control the exposure at source with local exhaust ventilation or increased dilution ventilation to lower concentrations in the atmosphere.
- *Procedural Controls:* Reduce the numbers exposed or the time spent on the procedure, carry it out in specified areas and carry out routine monitoring and health and medical surveillance if needed.
- *Personal Protective Equipment:* Provide gloves, safety glasses, impervious aprons or overalls and/or respiratory protection to minimise the effects of exposure to hazardous substances.

Respiratory Protective Equipment (RPE)

In the COSHH hierarchy of controls, use of Respiratory Protective Equipment (RPE) is considered to be the last resort. RPE must only be considered when exposure cannot be adequately reduced by other means.

It is vital that the RPE selected is adequate for the purpose. It must reduce exposure as low as reasonably practicable, and in any case, to below any applicable Workplace Exposure Limits or other Control Limits.

RPE must fit the face of the wearer properly to be effective. To make sure that this is the case, the Approved Codes of Practice for *The Control of Asbestos at Work* and *The Control of Lead at Work* that support COSHH, recommend that face-fit testing of all RPE be carried out before use. This includes testing of full-face masks, half-face masks and disposable masks.

Face-fit testing helps ensure that inadequately fitting face-pieces are not selected.

Workplace Exposure Limits

Workplace Exposure Limits (WELs) have now replaced Maximum Exposure Limits (MELs) and Occupational Exposure Standards (OESs).

MONITORING & REVIEWING

The BoT, Managers and Working Group Leaders will continually monitor the effectiveness of this arrangement. The BoT, in conjunction with our Safety Consultants, will review this on an annual basis.

MANUAL HANDLING

OBJECTIVE

To minimise the risks of injury to Comrie Development Trust staff from manual handling activities.

ARRANGEMENTS

Pro-active measures will be taken to identify potential hazards, minimise the risk and improve the awareness of staff, when lifting, handling or moving loads.

Avoid – As far as reasonably practicable manual handling will be avoided. This will be achieved by use of mechanical lifting equipment such as sack trolley, wheeled containers and fork lifts (where available).

Assess – Where manual handling cannot be avoided, the risk of injury to staff will be assessed.

Reduce – Where a risk of injury has been identified effective control measures will be implemented to minimise the risk of injury.

Staff will be trained in their duties and responsibilities, hazard identification, risk reduction and safe lifting techniques.

Manual Handling training will help employees consider the Load, the Individual capabilities, the Task and the Environment where the work is carried out. This systematic process is presented as LITE. The training will also include the benefits of good kinetic lifting techniques.

Those employees at higher risk e.g. new or expectant mothers, or those with existing medical problems will be further assessed for safe manual handling.

MONITORING & REVIEWING

BoT, Managers and Working Group Leaders will continually monitor the effectiveness of this arrangement. The BoT, in conjunction with our Safety Consultants, will review on an annual basis.

YOUNG PERSONS RISK ASSESSMENT

OBJECTIVE

To ensure that Young Persons employed, or on Work Experience, at Comrie Development Trust are protected from harm.

ARRANGEMENTS

Risk Assessment will be carried out with due consideration to the type of tasks, the hazards associated with those tasks and the potential for harm as a result of a lack of maturity, or understanding on behalf of the Young Person.

The Risk Assessment process and controls will consider:

Psychological capacity: Are there critical tasks, which rely on skill, experience and an understanding of the task requirements?

We will provide young people with training and effective supervision, particularly where they might be:

- Using machinery with exposed dangerous parts e.g. chainsaws
- Potentially exposed to violent or aggressive behaviour.

Physical capability. Injuries can occur in jobs that require repetitive or forceful movements, particularly when combined with awkward posture or insufficient recovery time.

We will:

- Take account of the physique and general health, age and experience of the young person in our risk assessment;
- Provide training and supervision

Hazardous Substances (e.g. cleaning materials). All harmful chemicals or substances used in the workplace should be subject to a COSHH assessment. These will give an indication of any potential hazards and precautions that should be taken. Restriction on use or information will be provided.

Lone Working Safety. As a general rule Young Persons will not be placed in a Lone Working situation.

Additional guidance for employers is available in HSE Leaflet INDG 364(Rev1) *Young People and Work Experience*.

MONITORING & REVIEWING

The BoT, Managers and Working Group Leaders will continually monitor the effectiveness of this arrangement and a review will be carried out by the BoT, in conjunction with our Safety Consultants, on an annual basis.

Section 4



Health and Safety Arrangements

Training and Competency

TRAINING AND COMPETENCY

OBJECTIVE

To provide sufficient information and training for employees and volunteers to ensure their safety and well-being whilst at work.

To enable Comrie Development Trust to meet our legal requirements with regards to the provision of information, instruction and training.

ARRANGEMENTS

The updated HSE Health and Safety Law poster will be displayed for employees who are working on our premises.

Any new employee shall be given induction training on the first shift they work. On completion of the induction the employee shall sign a training record.

The induction training covers the following points:

- Health and Safety Arrangements
- Management and Employee Responsibilities
- Findings of Risk Assessments relevant to their work activities
- Health and Safety Concerns - Reporting Procedure
- First Aid and Emergency Arrangements
- Accident Reporting Procedure
- Fire Evacuation Procedure

Particular attention will be given to the needs of Young Persons during the induction process due to the greater Duty of Care owed to those individuals.

Training will be repeated periodically to ensure continued competence. This may require 'in-house' refresher training or a more formal course by external training providers. For instance, first aiders must have refresher training every 3 years.

Job specific training will be recorded and repeated as necessary in line with HSE guidance, manufactures recommendations or recognised industry standards. Technical competency, which cannot be demonstrated by qualifications, for example the use of a specialised piece of equipment, will be assessed on an individual basis and recorded.

MONITORING & REVIEWING

The BoT, Managers and Working Group Leaders will monitor and review the effectiveness of this arrangement on an annual basis.

CONTROL OF CONTRACTORS

OBJECTIVE

To reduce the likelihood of Contractors exposing employees, members of the public and others to risks to their health and safety or damage to the environment.

To satisfy our '*Due Diligence*' obligations in respect of activities undertaken on behalf of Comrie Development Trust.

ARRANGEMENTS

In order to protect the health and safety of our employees, visitors, contractors and others while on our premises, all Contractors are required to provide information regarding their health and safety arrangements, in accordance with HSE guidance leaflet INDG 368 *Use of Contractors*.

The vetting procedure is initiated by the prospective Contractor completing the Health and Safety Questionnaire. Contracts will be awarded to these contractors that appear on the list of "Approved Contractors". Only those contractors who have satisfied our requirements by providing documentary evidence of competence will feature on the list.

Any Contractor who fails to co-operate in maintaining suitable and sufficient safety standards, or acts in a manner that may result in environmental pollution will be removed from the list.

Risk assessments have been carried out by the responsible person and are available where required Contractor personnel have a copy of the above safety documents, prior to commencing work.

Contractors are provided with appropriate health and safety information in respect of our activities that may expose them to risk.

MONITORING & REVIEWING

We will continually monitor these arrangements. A more formal review will take place on an annual basis. This review will be conducted by the BoT, in conjunction with our Safety Consultants.

ALCOHOL & DRUGS IN THE WORKPLACE POLICY

OBJECTIVE

The objective is to act as a responsible employer in acknowledging the dangers of alcohol and drug misuse and to encourage those employees with an alcohol or drugs problem to seek help. It aims to ensure fairness and consistency in the treatment of employees in relation to alcohol and drugs through the promotion of good employment practices.

ARRANGEMENTS

The consumption of alcohol is recognised as a part of social life and is normally a personal matter for individuals to consider. This section considers the position for employees whilst at work.

In some areas, it may be necessary to require more stringent rules concerning alcohol (for example where use of machinery is a requirement of the job) and managers should bring this to the attention of their staff.

Employees who drive as part of their job must not consume alcohol whilst at work nor be under the influence when they come into work. In any case, any employee who is driving (for example to and from work), is under a legal obligation to remain within the statutory limits of alcohol consumption.

An employee who is an essential user or a regular driver on company business, who loses their licence due to a conviction for driving whilst over the legal alcohol limit will have their individual circumstances assessed and a decision taken according to the requirements of their job. Where the employees contract stipulates the need to maintain a driving licence as a fundamental part of their job, termination of employment if banned from driving could not be ruled out. However, Comrie Development Trust would give consideration to offering an alternative role which does not require an employee to drive. This, however, could not be guaranteed and terms of employment would not necessarily be protected.

DRUGS & THE LAW

In the UK, illegal drugs are classified into three main categories, Class A, B or C. Class A drugs attract the most serious punishments and fines. Drugs are classified under the Misuse of Drugs Act 1971.

Class A

Drugs such as heroin, methadone, cocaine, crack and Ecstasy, LSD, methamphetamine (crystal meth) and amphetamines (speed) if prepared for injection fall into Class A. Conviction for possession, in a Crown Court, can lead to a maximum seven year prison sentence and a fine. The maximum penalty for trafficking is life imprisonment plus a fine.

Class B

Class B drugs include amphetamines (speed), and barbiturates. The maximum penalty for possession of a Class B drug, if the case reaches Crown Court, is five years, plus a fine. For trafficking, the sentence can be up to 14 years, plus a fine.

Class C

Class C, the lowest class of drugs, includes mild amphetamines (such as slimming tablets), tranquillisers, anabolic steroids and (since January 2004) cannabis.

Benzodiazepine drugs such as Temazepam and Valium are also categorised as Class C drugs.

Maximum sentences are two years for possession and five years for trafficking.

Under the Misuse of Drugs Act, it is an offence:

- to unlawfully possess a controlled drug
- to possess a controlled drug with intent to supply it
- to unlawfully supply (sell/give/share) a controlled drug
- to allow premises you occupy or manage to be used for the smoking or use of drugs

An employee must not take, supply, be in the possession of or under the influence of any controlled drug during working hours except under medical supervision.

Provision of Assistance to Employees with an Alcohol or Drug Dependency Problem

Comrie Development Trust recognises the potential dangers to the health and safety of drug or alcohol misusers and their colleagues if the problem is not acknowledged and goes untreated.

When dealing with problems caused by suspected alcohol or drug misuse Comrie Development Trust will make a full investigation of all the circumstances before deciding the appropriate action. It may be appropriate for an assessment to be made by an occupational health adviser. Wherever possible, the employer will seek to intervene at an early stage. Often, the person may not wish to acknowledge that he/she has a problem and it will be colleagues who notice the signs and decide whether they feel able to talk about it. It is a sensitive area and one which requires careful handling. The Line Managers are able to talk through any concerns they may have with the BoT, if they think there is a possibility that a member of staff has an alcohol or drug problem.

Employees are able to speak confidentially to their manager where they wish to discuss an issue relating to drug or alcohol use. This may be about a problem relating to themselves or to a colleague. At all times employees must be assured that the situation will be handled sensitively.

Where there is habitual, excessive or inappropriate use of alcohol or drugs leading to absence, deterioration in performance or misconduct, Comrie Development Trust undertakes to work with the employee (and their GP if appropriate) to establish whether external confidential counselling and professional support would be of assistance. It may be, for example, that the local Alcohol and Drug Advisory Service or Alcoholics Anonymous could be approached for assistance. These organisations are able to offer counselling and advice free of charge. The employee must feel he/she is being supported in an atmosphere of trust. At all times, the employee must be assured of confidentiality. Where it is necessary to involve others, for example, an occupational health adviser, this must be with the consent of the employee concerned.

Where there is a concern regarding an employees well being, work performance or conduct believed to be caused by alcohol or drugs, the employee will be referred to an occupational health adviser. Where treatment is considered appropriate by the medical advisers and refused by the employee or treatment is unsuccessful, the employer will consider other options open. This may, for example, include suspension of sick pay and/or dismissal. In some circumstances where misconduct is suspected, disciplinary steps will be considered. Each individual set of circumstances will be given full consideration before any action is taken.

In cases of misconduct, the employer may agree to suspend disciplinary action where an alcohol or drug problem is identified, on condition that the employee follows an agreed course of action. Where gross misconduct is involved an alcohol or drug problem may be taken into account in determining disciplinary action. In each case, the individual circumstances will be considered carefully.

Prescription Drugs

It is dangerous for yourself, or other persons, to operate machinery or drive under the influence of medicines. These could be either prescription medicines or those bought over the counter. Any medication that impairs the employees ability must be disclosed to the employer.

Communication of this Statement

Managers and Group Leaders are to brief new members staff as part of the normal induction process. Awareness training and information leaflets giving guidance will offered where necessary.

MONITORING & REVIEWING

A review of this procedure and the effectiveness of the controls will be undertaken if alcohol or drug misuse is suspected. A formal review, conducted by the BoT, in conjunction with our Safety Consultants, will take place on an annual basis.

LONE WORKING POLICY

OBJECTIVE

To provide a structured policy and procedure to ensure the health, safety and well-being of employees who may be required to work alone.

ARRANGEMENTS

The Comrie Development Trust Lone Working policy is intended to cover all work activities where the risk to the individual lone worker may be increased, either by the work itself or the lack of on-hand support should something go wrong. It is not therefore intended to cover normal, low risk day-to-day activities carried out in a normal low risk environment, where employees are left alone as part of their daily routine.

It does however cover working alone in remote or isolated areas during normal working hours where associated hazards are clearly evident.

Lone Working Assessment are supplementary to any existing general health and safety risk assessment, and cover additional specific risks arising from remote working, out-of-hours working, geographical or social influences that may increase the risk. The work activities, equipment to be used, experience, age and gender of the employee should all be considered in the Lone Worker Assessment.

Control measures for Lone Working rely heavily on communications. If a member of staff gets into difficulty they must be able to contact help, this likely to be by mobile phone or radio. However, knowing the movements of staff is critical to the success of the safe working procedure. Visits should be planned, where reasonable practicable, and communicated to someone else in the organisation.

A “*Late Back*” procedure is in place. This will enable an employee’s partner to contact a designated member of the Comrie Development Trust staff if the employee does not return home from work.

In the first instance the partner should attempt to phone the Lone Worker to ascertain their whereabouts. If this fails, a call should be made to a CDTManager or Group Leader. They may contact other members of staff who might know where the Lone Worker has gone. If he still cannot be found and it becomes clear that there is no reasonable reason for the person to be delayed, then a call to the Police could be initiated.

Copies of the HSE guidance on Lone Working: <http://www.hse.gov.uk/pubns/indg73.pdf> should be made available to employees. These can be downloaded free of charge from the Internet.

MONITORING & REVIEWING

A review of this procedure and the effectiveness of the controls will be undertaken as a result of a “Near Miss” or when an employee feels vulnerable or threatened in a lone working situation. A formal review, conducted by the BoT, Managers and Working Group Leaders and the Health & Safety Consultant, will take place on an annual basis.

Section 5



Health and Safety Arrangements

Accidents and Emergencies

FIRST AID ARRANGEMENTS

OBJECTIVE

To provide suitable and sufficient first aid arrangements and facilities for employees whilst at work.

To enable Comrie Development Trust to meet our legal requirements with regards to the provision of first aid facilities.

ARRANGEMENTS

Appropriate notices are displayed informing our employees of the first aid arrangements including the location of the first aid container and the person appointed to deal with first aid issues.

The Managers or Working Group Leaders are the main reporting point for any first aid or emergency requirements. Records of all first aid treatments are documented in the Accident Book and kept for a minimum of three years.

All first aid incidents occurring on CDT property are to be reported to the Office Manager.

We ensure that there is at least one Appointed Person available during working hours. First aiders must have refresher training every three years. It is our intention that all core members of staff will attend an approved Emergency First Aid at Work (EFAW) training course.

The number of first aiders is established by conducting an assessment. This is influenced by the number of people on the premises, any hazards present and the availability of professional medical assistance, as set out in HSE guidance leaflet INDG 214(Rev2) *First Aid at Work*.

The First Aid Containers are kept stocked in line with the First Aid at Work Regulations Approved Code of Practice and the current BS Standard (BS8599).

First Aid containers are held in the Office and with Working Group Leaders. Additional First Aid containers will be accessible if identified by a risk assessment.

MONITORING & REVIEWING

The BoT, Managers and Working Group Leaders will monitor and review the effectiveness of this arrangement on an annual basis, in conjunction with our Safety Consultants.

ACCIDENT or INCIDENT REPORTING

OBJECTIVE

To enable Comrie Development Trust to meet our legal requirements with regards to the Reporting of Injuries, Diseases, and Dangerous Occurrences Regulations (RIDDOR).

ARRANGEMENTS

All accidents, injuries, diseases, dangerous occurrences and near misses are reported to the Office Manager (however minor).

The Office Manager will ensure records of all accidents involving employees or visitors are retained in the accident book BI510 or equivalent. Records of all accidents/incidents must be retained for a **minimum** period of three years

Reportable accidents/incidents are constituted by the following:

- a) Death
- b) Specified Major Injury
- c) Injuries to people not at work
- d) Specified Dangerous Occurrences
- e) Specified Diseases
- f) Over seven day injury

Reporting of accidents/incidents associated with a) to d) above, should be reported to the Enforcing Authority by the quickest practicable means, usually a telephone call, followed by a e-mail report within 10 days. For cases involving e) and f) the written report within 15 days is the accepted reporting format. There are two ways of reporting accidents/incidents:

Tel: 0845 300 99 23 (**Monday - Friday 08.30 – 17.00**) Fatal and Major injuries only

Internet Reports: www.hse.gov.uk/riddor/report.htm

MONITORING & REVIEWING

The Office Manager will monitor and review the effectiveness of this arrangement on an annual basis, in conjunction with our Safety Consultants.

ACCIDENT or INCIDENT INVESTIGATION

OBJECTIVE

To establish the factors which led to the accident/incident and enable effective corrective actions to be implemented which will prevent recurrence.

ARRANGEMENTS

All accidents/incidents or Safety Concerns shall be investigated. However, the degree of investigation will be the decision of the BoT. This investigation will be dependent on the severity or potential severity of the injuries or damage to the environment.

Serious accidents/incidents will be reported immediately to the Chair of BoT to allow an investigation to be carried out. If necessary, external Safety Consultants can be contacted to assist in the carrying out of an accident investigation.

Most investigations have five key stages:

- | | |
|----------|--------------------------------|
| Stage 1. | Immediate response (see below) |
| Stage 2. | Gather the facts |
| Stage 3. | Analyse the facts |
| Stage 4. | Determine the causes |
| Stage 5. | Make recommendations |

The first stage (*Immediate response*) will require positive action from our organisation. This will include the following:

- i). Assess the situation
- ii). Ask for help and notify emergency service (if required)
- iii). First aid carried out
- iv). Preserve evidence at the scene
- v). Action from senior management.

The first responsibility must be to assess situation for further hazards and then check the injured person. First Aid carried out immediately by a qualified First Aider. After making the area safe, take action to prevent the situation worsening. Preserve the evidence at the scene, if necessary by laying down a cordon. At this stage we will consider who should be notified. This may include an Enforcing Authority.

MONITORING & REVIEWING

The BoT, Managers and Working Group Leaders will monitor and review the effectiveness of this arrangement on an annual basis, in conjunction with our Safety Consultants.

SHARPS or NEEDLESTICK INJURY POLICY

OBJECTIVE

To provide a structured policy and procedure to ensure the health, safety and well-being of Comrie Development Trust employees who may be exposed to sharps, or needle stick injuries, as a result of their work activities.

ARRANGEMENTS

Employees may be exposed to discarded sharps or needles when cleaning the rooms or the toilets. There is a potential risk of infection associated with blood-borne diseases e.g. hepatitis and HIV.

We will introduce a Needle Reporting System (NRS) to allow the BoT, Managers and Working Group Leaders to assess the future likelihood of exposure.

If it becomes necessary to remove any discarded sharps the Director will be informed immediately and preventative control measures will be implemented. These will include:

- Providing appropriate tools for handling and disposal of sharps
- Pincer tools, tongs, tweezers or dustpan and brush
- Sharps box capable of safely containing needles (BS 7320:1990)
- Gloves with a high degree of puncture resistance (EN 388:2003) **Note:** Gloves should not be relied upon to give adequate protection on their own, but used as secondary protection in the case of accidental contact.
- An adequate first aid kit should be available to employees at all times. Clean water or sterile wipes for cleaning wounds and a supply of sterile waterproof plasters should be available.

If the problem becomes more common, and therefore a greater risk, we will consider staff immunisation against blood-borne diseases and tetanus

Employees will be instructed in the procedure for the safe handling of discarded needles. This will include the action to take following a puncture wound from a needle:

- Encourage the wound to bleed (do not suck the wound)
- Rinse thoroughly under running water or clean with sterile wipes and apply a plaster
- Secure the needle (for contamination analysis)
- Seek medical attention immediately (contact the nearest Accident & Emergency facility)
- Inform the Director as soon as possible
- Record incident in accident book

Needlestick injuries are reportable under RIDDOR 2013 if the person is off work for more than 7 days, or they develop a blood-borne disease as a result of the injury.

MONITORING & REVIEWING

A review of this procedure and the effectiveness of the controls will be undertaken if sharps are discovered. A formal review, conducted by the BoT, will take place on an annual basis, in conjunction with our Safety Consultants.

Section 6



Health and Safety Arrangements

Fire Safety

FIRE RISK ASSESSMENTS

OBJECTIVE

To ensure that we meet our legal obligation in respect of workplace Fire Risk Assessments, using the *Practical Fire Safety Guidance* document, which was issued by the Scottish Government.

To identify significant fire hazards that may present a risk to employees and others and to establish effective control measures that will minimise the risk of fire.

ARRANGEMENTS

Fire Risk Assessments are carried out and reviewed by a Competent Person. Specialist advice has been sought from John Morris Safety Ltd.

The process is achieved through a Five Step Approach:

- Step 1. Identify the hazards e.g. sources of ignition, combustible materials etc
- Step 2. Decide who may be harmed and how
- Step 3. Evaluate the risks and decide whether existing precautions are adequate or whether more should be done
- Step 4. Record and communicate your findings
- Step 5. Review your assessments

Fire Hazards are recorded on Fire Risk Assessment Matrix and are identified as High, Medium or Low risk.

Existing control measures are recorded on the Fire Risk Assessment form and where necessary to reduce the risk, further control measures will be identified. When effectively implemented these additional controls are recorded on the rear of the form.

Employees and others are made aware of the significant risk to their safety. They are also advised of the control measures put in place to reduce those risks.

MONITORING & REVIEWING

As with any management process a review must be carried out at regular intervals to ensure that the assessments are still relevant. This is carried out annually by the BoT, Managers and Working Group Leaders and recorded on the rear of the assessment form.

FIRE PREVENTION

OBJECTIVE

To establish effective management arrangements, which will prevent or minimise the likelihood of an outbreak of fire, by using the appropriate *Practical Fire Safety Guidance* document, which has been issued by the Scottish Government.

ARRANGEMENTS

The policy on fire prevention is that the first line of defence against the outbreak of fire will be through the pro-active management approach to fire safety. We intend to focus on preventing an outbreak of fire in addition to dealing with the consequences of fire.

Fire risk assessments are undertaken to identify any existing hazards and introduce the necessary control measures to remove or reduce that risk to an acceptable level.

To ensure that all efforts are focused on preventing an outbreak of fire, arrangements have been made to carry out the routine testing, inspection and maintenance of the Fixed Electrical Installations and Portable Electrical Appliances.

This also includes established procedures for housekeeping standards and waste disposal.

All employees receive induction training relating to fire prevention and fire safety. This may be supplemented by specific Fire Safety Training where necessary.

Where 'hot work', such as welding, grinding or soldering, is undertaken Contractors are to pay particular attention to fire prevention control measures. Regular checks for smouldering debris or accumulation of combustible waste are carried out.

MONITORING & REVIEWING

The BoT, Managers and Working Group Leaders will monitor and review the effectiveness of this arrangement on an annual basis.

FIRE DETECTION, ALARM and SUPPRESSION ARRANGEMENTS

OBJECTIVE

To provide suitable and sufficient means of detecting the effects of fire, raising the alarm and providing appropriate fire-fighting equipment.

ARRANGEMENTS

The Fire Risk Assessment process has identified appropriate controls which include fire detection, alarm and suppression.

Fire detection in Events Huts is provided by means of an automatic smoke detector system.

Otherwise if a fire is detected the person will raise the alarm by shouting “**FIRE, FIRE, FIRE**”, and calling the Fire & Rescue Service from the nearest telephone.

Fire fighting appliances are provided and selected staff are instructed in the safe use of these appliances

All fire protection equipment is tested, under contract, in accordance with legislative requirements, manufacturers’ recommendations or appropriate British Standards

Emergency Lighting and Fire Action Notices are located throughout the premises.

MONITORING & REVIEWING

The BoT, Managers and Working Group Leaders will monitor and review the effectiveness of this arrangement on an annual basis.

FIRE or TERRORIST THREAT POLICY

OBJECTIVE

To provide a structured policy and procedure to ensure the health, safety and well-being of employees and the public in the event of fire or terrorist threat.

ARRANGEMENTS

1. The manual method of raising the alarm in the event of a fire is by activating the Emergency Alarm Bells and shouting **FIRE!!!! FIRE!!!! FIRE!!!!** One of the staff shall contact Emergency Services on 999 or 112.
 2. On hearing the alarm being raised you should quickly and calmly evacuate the public and leave the building immediately using the designated routes. Do not stop to collect any personal belongings and assemble at the **Fire Assembly Point**, where the Manager or Working Group Leader shall account for all members of staff and or volunteers. **DO NOT** re-enter the building until the all clear has been given.
 3. **Fire fighting** should only be carried out by trained personnel and only in the early stages of fire, however if the fire becomes established all persons **must evacuate the premises immediately.**
 4. In the event of a terrorist threat or discovery of an Improvised Explosive Device (IED) evacuate to the assembly point, or at least 200m from the IED, and await further instructions. Do not attempt to disturb or move the IED.
 5. Take a note of the IED location and any distinguishing features e.g. size, shape and appearance.
 6. Report findings to Police or Emergency Services in attendance.
-

MONITORING & REVIEWING

A review of this procedure and the effectiveness of the controls will be undertaken in the event of a fire, or an increased national security threat. A formal review, conducted by the BoT and our Health and Safety Consultant, will take place on an annual basis.

Section 7



Health and Safety Arrangements

Equipment Safety

PORTABLE ELECTRICAL EQUIPMENT & FIXED ELECTRICAL INSTALLATIONS

OBJECTIVE

To ensure portable electrical equipment and fixed electrical installations do not expose employees and other to risks to their health and safety.

ARRANGEMENTS

A register of portable electrical equipment is established. Each item is given a unique serial number. All portable electrical equipment must be registered and tested prior to initial use.

Only 110v CTE electrical appliances will be permitted on on outdoor working sites.

Portable electrical equipment is subject to PORTABLE APPLIANCE TESTING (PAT) on a regular basis. However, some items such as DOUBLE INSULATED equipment may not require full PAT testing.

Certain items of portable electrical equipment, due to the environment in which they are used, may require more frequent PAT testing. Further guidance on the Suggested Initial Frequency of inspection and testing of equipment can be found in HSE Guidance Leaflet INDG 236(Rev 3).

A Formal Visual Inspection (FVI) is carried out by a competent person, on all portable electrical appliances. The frequency will depend on the type of equipment and the environment in which it is used. Records of the FVI are maintained.

Employees are instructed in the safe use of portable electrical equipment. What to look for, e.g. signs of damage or obvious external defects and what actions to take with the appliance on discovering a defect (see Annex A).

Any “hired in equipment” must be accompanied with the appropriate test certificate (we ask for these when equipment is ordered).

The Fixed Electrical Installations are inspected and tested at regular intervals not exceeding five years. The inspection and tests are carried out by a competent person. This may be a qualified electrical engineer or an approved electrical contractor. Results of inspections and testing shall be recorded and Certificates issued.

Following initial or renewal work on any electrical installation a Certificate of Completion is to be provided with the result of the inspection and test.

MONITORING & REVIEWING

The BoT, Managers and Working Group Leaders will monitor and review the effectiveness of this arrangement annually, in conjunction with our Safety Consultants.

(Annex A to Health and Safety Arrangements)

PORTABLE ELECTRICAL APPLIANCES – USER CHECKS

The user check is considered an important safety precaution. Many faults can be determined by a visual inspection. The user is the person most familiar with the equipment and may be in the best position to know if it is in a safe condition and working properly. No record is made of a user inspection unless some aspect of the inspection is unsatisfactory. The user inspection should proceed as follows:

- a) consider whether he/she (user) is aware of any fault in the equipment and whether it works properly
- b) disconnect the equipment if appropriate
- c) inspect the equipment. Paying particular attention to:
 - (i) the flex – is it in good condition? Is it free from cuts, fraying and damage? Is it in a location where it could be damaged, is it too long, too short or in any other way unsatisfactory? Does it have inadequate joints?
 - (ii) the plug (where fitted) – is the flexible cable secure in its anchorage? Is it free from any sign of overheating? Is it free from cracks or damage?
 - (iii) the socket outlet or flex outlet – is there any sign of overheating? Is it free from cracks and other damage?
 - (iv) the appliance – does it work? Does it switch on and off properly? Is it free from cracks, contamination damage to the case, or damage which could result in access to live parts? Can it be used safely?
 - (v) users – are they satisfied that the equipment works properly?
 - (vi) the environment – is the equipment suitable for its environment?
 - (vii) suitability for the job – is the equipment suitable for the work it is required to carry out?
- d) take action on faults/damage.

Faulty equipment must be:

- (1) switched off and unplugged from the supply
- (2) labelled to identify that it must not be used
- (3) reported to the responsible person

Note: If where equipment is found to be damaged or faulty on inspection or test, an assessment must be made by a responsible person as to the suitability of the equipment for the use/location. Frequent inspections and tests will not prevent damage occurring if the equipment is unsuitable. Replacement by suitable equipment is required.

VEHICLE, PLANT & MACHINERY SAFETY

OBJECTIVE

To ensure all plant, equipment, machinery and tools are operated and maintained safely.

ARRANGEMENTS

Any plant and equipment used by Comrie Development Trust will be operated and maintained in accordance manufacturers' recommendations.

Operators will carry out a Before Use Inspection of any vehicle, plant or powered equipment. The inspection is to be recoded on the document provided and retained for audit purposes.

All staff are trained to use equipment in accordance with manufacturers' recommendations, including the proper use of safety devices and guards.

Records of staff training are retained on file. Refresher training will be provided where necessary.

The respective Manager or Working Group Leaders are responsible for ensuring that only authorised and competent employees are permitted to operate equipment.

Contract maintenance is to be established where the in-house skills are not available.

All plant and equipment will meet the Essential Health and Safety Requirements (EHSR) and carry the CE marking. The equipment will only be used for the purpose for which it was designed.

Note: No maintenance or cleaning will be carried out on live equipment. Plant and equipment must be isolated and allowed to cool off before maintenance. Where necessary a Safe System of Work will be established e.g. a Permit to Work or a *Lock Out Tag Out* procedure.

MONITORING & REVIEWING

We will continually monitor these arrangements. A more formal review will take place on an annual basis. This review will be conducted by the BoT, Managers and Working Group Leaders, in conjunction with our Safety Consultants.

GAS APPLIANCES

OBJECTIVE

To reduce the likelihood of an incident involving gas equipment causing a fire, explosion or carbon monoxide poisoning.

ARRANGEMENTS

A check that the gas appliance is switched off must be carried out before leaving the premises at the end of the day.

All staff must be made aware of the location and operation of the:

- Manually operated Emergency Gas Shut-off Valve (Identified with a yellow handle)
- and the Automatic Emergency Gas Shut-off.

Gas Appliances - Safety Checks

Due to the dangers of carbon monoxide poisoning, all gas appliances will have a safety check carried out every 12 months.

We will ensure that only competent persons carry out work on gas appliances. All individuals who work on gas appliances must be registered with the Gas Safe Register and provide proof of current registration before commencing work. This can be confirmed by phoning Gas Safe Tel **0800 4085500**, or through their website www.gassaferegister.co.uk.

MONITORING & REVIEWING

The BoT, Managers and Working Group Leaders will continually monitor the progress of these arrangements. A more formal review will take place on an annual basis. This review will be conducted by the BoT in conjunction with our Safety Consultants.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

OBJECTIVE

To provide Comrie Development Trust employees with a last line of defence against risks to their health and safety.

ARRANGEMENTS

Personal Protective Equipment (PPE) will be issued, free of charge, to all employees.

The PPE will be considered a last line of defence, to mitigate residual risks that cannot be controlled by other means, using the hierarchal of control principles.

Where a range of PPE is to be worn at the same time they must be fully compatible with each other.

PPE must carry a CE mark and be appropriate for the hazard it is intended to guard against. This will require an assessment of the risks. Reference should be made to Material Safety Data Sheet (MSDS) when appropriate Respiratory Protective Equipment (RPE), gloves or goggles are required.

PPE must be properly maintained and stored to prevent damage when not in use.

Employees must be provided with instructions on how to use PPE safely and correctly.

A record of PPE issue and maintenance has been established. Replacement PPE will be issued on a "new for old" basis.

Employees must report the loss or damage of PPE to the Manager or Working Group Leader as soon as possible.

Each employee will be given a suitable bag in which to store his PPE. The contents will include:

Hard-hat

Hearing Protection

Gloves

Wellington Boots

Hi-viz Jacket and trousers

Hi-viz vest

Specialist PPE when using chainsaw or brush cutting equipment

Specialist PPE, or Respiratory Protective Equipment (RPE), will be issued dependent on the findings of Risk Assessments or COSHH Assessments.

MONITORING & REVIEWING

The BoT and the Working Group Leaders will continually monitor the effectiveness of this arrangement. An review will be carried out on an annual basis, in conjunction with our Safety Consultants.

LADDER SAFETY

OBJECTIVE

To ensure all Comrie Development Trust ladders and steps are used correctly and maintained in a safe condition.

ARRANGEMENTS

All ladders and steps used by Comrie Development Trust will be used and maintained in accordance manufacturers' recommendations.

Only trained and authorised CDT staff are insured to use ladders. HSE Information INDG402 will be used as guidance.

Each task should be assessed for the suitability of using a ladder. The following should be considered:

- What is it to be used for (is it safe to use a ladder?)
- Type of ladder
- Duration of the work
- Wear and tear of the equipment
- Frequency of access
- Training and abilities of users
- Workplace conditions including external factors e.g. weather & ground conditions
- Loads to be carried
- Prevention of falls
- Work platforms (would it be safer to use an alternative means of access?)

The respective Managers or Working Group Leaders are responsible for ensuring that only authorised and competent employees are permitted to use ladders and steps

All staff are to carry out a Before Use Inspection of their ladders and steps to ensure that they are safe for intended use. Any equipment that is found to be unsafe will be removed from service immediately. All repairs will be carried out by a competent person.

Ladders and steps are subject to a scheduled annual visual inspection. These inspections will be recorded and records retained for audit purposes..

All ladders and steps will meet the Essential Health and Safety Requirements (EHSR) and carry the CE marking. The equipment will only be used for the purpose for which it was designed.

MONITORING & REVIEWING

The BoT, Managers and Working Group Leaders will continually monitor the effectiveness of this arrangement and a review will be carried out on an annual basis, in conjunction with our Safety Consultants.

Section 8



Health and Safety Arrangements

Environmental Protection

PRODUCTION AND DISPOSAL OF CONTROLLED WASTES

OBJECTIVE

To provide a procedure for practical, on-site management of the issues raised by the storage and disposal of waste materials with respect to the current best practice and legislation.

ARRANGEMENTS

Any material which requires to be disposed of is classed as Controlled Waste and/or Commercial Waste under the terms of relevant environmental legislation. Suitable budget resources should be allocated when a Comrie Development Trust contract identifies the production of waste.

Where practicable, materials should be placed and stored in suitable containers, capable of being secured at the end of each working period. Waste material should not be left unsecured when the site is vacant.

To dispose of their waste, Comrie Development Trust are required to be Registered Waste Carriers. Alternatively, a registered waste company should be selected. Current registration validation should be checked with the local SEPA office prior to the ordering of skips etc, or any form of contract agreement.

Before any waste material leaves the site, both parties should complete a suitable waste transfer note. This note must contain the following information:

- the type and quality of waste
- container type
- date and time of transfer
- where transfer occurred
- names and addresses of both parties involved
- whether the person transferring the waste is the producer or the carrier of the waste
- category of person authorised should be specified
- if either, or both parties are registered carriers, the certificate number and issuing Environment Agency must be given
- the name and address of any broker (third party) involved in the transfer, if relevant
- where an activity, in which there is a beneficial use of the waste which exempts it from licensing, details of that activity should be provided.

Comrie Development Trust is required to keep copies of transfer notes for two years and these should be made available to SEPA, if required. The deposit of the waste at the licensed/exempt site specified should be checked by CDT in order to fulfil Duty of Care requirements.

Special Waste

Where activities of Comrie Development Trust produce waste which is, or is suspected to be, Special Waste, detailed consideration and investigation of the properties of the waste should be carried out to ensure reporting and investigation. The Director must also be notified.

Schedule 2 of Part 3 of the Special Waste Regulations should be consulted in conjunction with the Approved Supply List (ASL) for the purposes of evaluating the waste in line with CHIP, Chemicals (Hazard Information and Packaging for Supply) Regulations as amended.

Once waste has been positively determined to be Special, all other precautions for which care when handling is required should be given on the consignment note.

Every movement of special waste must be accompanied by a consignment note, available for a fee from SEPA offices. All relevant details and information concerning the waste etc must be noted on the consignment

note which is similar in nature to the transfer note system. Comrie Development Trust must complete Parts A and B of the consignment note.

Comrie Development Trust must send the white copy to the Environment Agency office where the final disposal site lies, **prior** to collection of the waste.

Upon collection, the green copy must be detached and retained by CDT in a register for a period of three years. The remaining copies should be given to the vehicle driver.

For information:

White Copy:	is sent to the relevant Environment Agency office re final disposal prior to waste collection
	is retained by BoT in a register for a period of three years.
Yellow Copy:	is sent to the Environment Agency office by the owner of the final disposal site.
	is also kept by the disposal site owner for the duration of the site lifetime.
Orange Copy:	is the carrier copy and must also be kept for three years.

MONITORING & REVIEWING

The BoT, Managers and Working Group Leaders will continually monitor the effectiveness of these arrangements. A formal review will be carried out on an annual basis by the BoT.

PRESENCE AND PROTECTION OF CONTROLLED WATERS, INCLUDING GROUNDWATER AND SEALED DRAINAGE SYSTEMS

OBJECTIVE

To provide a procedure of practical, on-site management of work activities near water given current best practice and relevant legislation.

ARRANGEMENTS

When Comrie Development Trust work activities involve working near a watercourse or drain, the responsible Foreman shall ensure that all staff are aware of its presence and that this procedure is duly implemented for the duration of the project.

Where the project requires the use of oil, solvent based materials or liquid chemicals etc, the Foreman shall ensure that all safety data sheets are available on site should environmental or emergency responses be necessary. The information shall include toxicity or other impact assessment data to assist outside agency staff if required.

All materials will be stored in a suitable bunded area, at least 10 metres from any watercourse or drain. The bund facility must be at least 110% of the capacity of a single tank or drum. Where two or more tanks or drums are present within the same bund, the capacity of the bund should be at least 110% of the largest tank or drum (or 25% of the total volume stored) whichever is the greatest.

Suitable oil and chemical storage facilities should allow levels of substance present to be easily identified in the event of spillage. Any event, giving rise to the use of the absorption material, shall require the subsequent disposal operation to comply with the procedure for disposing of controlled wastes.

The bunded storage area will be of impervious construction and have no sumps or internal drains which would lead to a spillage of a substance or allow contaminated rainfall to escape. All associated pipe, refuelling nozzles or peripheral equipment shall be stored in the bunded area when not in use. Nozzles and valves shall be secured or locked/padlocked to reduce vandalism or unauthorised interference.

Any leaking or empty storage drums shall be removed from site by a suitable contractor in accordance with the requirement of disposal of special waste, specified in the company Waste Management Procedure.

The bunded storage area will have suitable emergency fire equipment in place where the nature of the substance stored requires such facilities. The site shall have emergency spillage absorption material and associated PPE available in order to reduce the risk of any internal or external spillage of oil or chemical.

Oil booms may be required on site. These will be used where health and safety considerations allow their use and they shall be used across the width of the watercourse to prevent downstream movement of oil.

Spillages

Watercourse: should any spillage result in the contamination of a watercourse, the Foreman shall, after notifying the Director, inform SEPA of the event and of any remedial measures carried out on site (**SEPA telephone number: 0800 807060**).

Public Sewer: should any spillage result in contamination of a public sewer, the Manager or Working Group Leader shall, notifying the BoT.

Soil: should any spillage result in localised contamination of any soil, the soil shall be excavated and removed to a suitably licensed site in accordance with the Waste Management Procedure.

Drip trays or Oil Nappies shall accompany the use of any on-site generators or plant in order to prevent accidental contamination of the soil in the area of their use.

Should any solid material inadvertently enter a watercourse or sewer, this shall be removed at the earliest opportunity in order to prevent any impediment to the natural flow of the watercourse or sewer.

The Manager or WGL shall ensure that any heavy plant requiring to work around a watercourse do so with care in order to reduce silt production, which will affect water quality. Bank restoration shall be undertaken on completion of the works.

No work tools or equipment shall be cleaned in or near any watercourse or drains.

Septic Tank

Before installing a septic tank it must be established that the ground has suitable soakaway capabilities. This is achieved by obtaining a Percolation Test Certificate (carried out in accordance with BS 6297).

Septic tanks should not be sited less than 10 metres from any ditch, stream, drain or watercourse.

Septic tanks should be de-sludged and serviced on a regular basis to ensure effective operation. De-sludging should normally take place every 12 months and should be carried out by an operator registered for the carriage of such waste by the SEPA. Check the operating licence is still valid.

Retain all waste transfer documentation for **3 years**.

It is extremely important that clean uncontaminated roof water or surface water is excluded from the septic tank as this effectively reduces the tank's capacity and can cause solids to be flushed out of the tank.

MONITORING & REVIEWING

The BoT, Managers and Working Group Leaders will continually monitor the effectiveness of these arrangements. A formal review will be carried out on an annual basis by the BoT, in conjunction with the Safety Consultant.

ENVIRONMENTAL PLANS

OBJECTIVE

To provide a systematic means of identifying environmental issues associated with a project and document the measures required to reduce the risk to an acceptable level.

ARRANGEMENTS

During the planning stage of a contract the CDT will make use of the Environmental Plan as a checklist to identify the following issues

- Local Nuisance
 - Light, Noise & Dust
- Waste Management
 - Scrap metals
 - Asbestos
 - Soil or road scrapings
 - Other waste
- Ecological Harm
 - Damage to wildlife
 - Damage to Flora
- Discharges to Air
 - Dust
 - Exhaust fumes
 - Hazardous material
- Discharges to Water and Land
 - Silt and Spillage
 - Run off (including emergency situations e.g. fire)

The CDT shall have access to Pollution Prevention Guidelines (PPGs), which are produced by SEPA. These shall provide best practice guideline for work undertaken by Comrie Development Trust in respect of Environmental Protection.

MONITORING & REVIEWING

The BoT, Managers and Working Group Leaders will continually monitor the effectiveness of these arrangements. A formal review will be carried out on an annual basis by the BoT, in conjunction with our Health and Safety Consultant.

Section 9



Health and Safety Arrangements

Construction, Design & Management (CDM)

CONSTRUCTION, DESIGN and MANAGEMENT (CDM) 2015

OBJECTIVE

To ensure we meet the requirements of the Construction (Design and Management) Regulations by:

- Identifying when CDM applies
 - Outlining responsibilities of key parties
-

ARRANGEMENTS

We will ensure the requirements of the CDM Regulations are complied with by:

- Setting a realistic programme with time allowed for planning, preparation and the task;
- Ensuring the early appointment of key people;
- Enlisting, where appropriate, the assistance of competent duty holders with sufficient resources to meet their legal duties;
- Ensuring the early identification and reduction of risks;
- The provision of health and safety information from the start of the design phase, through construction and maintenance to eventual demolition, so that everyone can discharge their duties effectively;
- Ensuring the co-operation between duty holders; and
- Making effort and resources proportionate to the risk and complexity of the project to be applied to managing health and safety issues.

The revised CDM Regulations apply to almost all building and engineering construction work including the following:

- any construction, alteration or conversion (including domestic property)
- renovation, repair and redecoration
- site clearance, excavation or laying foundations
- any demolition work

Projects are notifiable to the Health and Safety Executive if the construction phases:

- will last longer than 30 working days and have more than 20 people working on site, or
- will involve more than 500 person days of construction work

The CDM Regulations 2015 now apply to domestic clients when the work is on the residence, not used for business, of a domestic householder.

Duties of Key Parties

The Client (CDT Board of Trustees)

Key duties are:

- Select and appoint a competent Designer and Contractor
- Be satisfied that Designers and Contractors are competent and will allocate adequate resources when making arrangements to work on project
- Provide the Designer and Contractor with information relevant to health and safety on the project
- Ensure, when necessary, that project is notified to HSE by means of an F10
- Ensure construction does not commence until a satisfactory Construction Phase Plan is prepared by the Principal Contractor
- After the project is complete, ensure Health and Safety File is available for inspection

The Principal Designer

Key Duties are:

- Alert clients to their duties
- Consider the hazards and risks which may arise during the development of designs
- Design to avoid or reduce risks to health and safety as far as is reasonably practicable
- Consider control measures if avoidance or reduction is not possible
- Ensure design includes adequate health and safety information
- Pass this information onto the Principal Contractor to include in health and safety plan
- Co-operate with Client, Principal Contractor and other Designers as necessary

The Principal Contractor (if more than one contractor is involved with the project)

Key Duties are:

- Develop and implement health and safety plan
- Arrange for competent and adequately resourced contractors for sub-contracted work
- Ensure co-ordination and co-operation of all contractors
- Obtain the main findings of risk assessments and control measures for high risk operations from contractors
- Ensure that contractors are given information about risks on site
- Ensure all site operatives are adequately trained and comply with site rules
- Monitor health and safety performance
- Ensure that workers are informed and consulted
- Ensure only authorised personnel are allowed on site
- Display the HSE F10 notification on site
- Provide information for the health and safety file

The Sub-Contractors or Self-Employed

Key Duties are:

- Provide information regarding the risks arising from their work and control measures implemented for the health and safety plan
- Manage their work to comply with the rules in the health and safety plan and direction given by Principal Contractor
- Provide information for health and safety file, e.g. injuries, dangerous occurrences, ill health
- Provide information to their employees

Additional advice can be sought from our Health and Safety Consultant.

MONITORING & REVIEWING

The BoT, Managers and Working Group Leaders will continually monitor these arrangements. A more formal review will take place on an annual basis. This review will be conducted by the BoT in conjunction with our Health and Safety Consultant.

CDM 2015 DOCUMENTATION REQUIREMENTS

OBJECTIVE

To ensure we satisfy the legislative requirements regarding CDM documentation. In addition, to provide sufficient safety related information to the appropriate parties.

ARRANGEMENTS

The following is a summary of the CDM related documents and their contents:

F10 Notification to HSE

The F10 Notification is sent by the Client, before work starts, using the HSE website. Information should include:

- Address of the construction site
- Name & address of all key parties including e-mail address
- Acknowledgement by Client of their responsibilities
- Type of project, planned start date and duration
- Time allowed by the Client to the Principal Contractor for any planning and preparation
- Estimated number of people working on site

The Pre-construction Information

The pre-construction information, prepared by the Client and the Designer, should include:

- General description of the project
- Details of timings within the project including the minimum time between appointment of Principal Contractor and start of work on site
- Details of risks to workers including any health hazards or survey reports e.g. Asbestos Survey
- Information required by potential Principal Contractors to demonstrate competence and adequacy of resources
- Information for preparing Construction Phase Plan and information for welfare provision for both the construction phase and if the project is to be a workplace
- Significant design and construction hazards

The Construction Phase Plan (Note: a CPP is now required for every construction project)

The Construction Phase Plan should be a development of the Pre-construction information and should include the following:

- Arrangements for ensuring the health and safety of all who may be affected by the construction work
- Arrangements for the management of health and safety of construction work and monitoring of compliance with health and safety law
- Information regarding welfare arrangements

Health and Safety File

The Health and Safety File is a record for the end user. This provides a source of information for any future works on site and the potential implications from this project.

Relevant information, which could be included in the Health and Safety File, includes:

- 'Record' or 'as built' drawings and plans used and produced throughout the construction processes;
- The design criteria;
- General details of the construction methods and materials used;
- Details of the equipment and maintenance facilities within the structure;
- Maintenance procedures and requirements for the structure;
- Manuals produced by specialist contractors and suppliers which outline operation and maintenance procedures and schedules for plant and equipment installed as part of the structure;
- Details of the location and nature of utilities and services, including emergency and fire fighting systems.
- Hazard Data sheets for any hazardous substances present (COSHH Assessments are not required for the H&SF).

Additional advice can be sought from our Health and Safety Consultant

MONITORING & REVIEWING

The Director and the BoT, Managers and Working Group Leaders will continually monitor these arrangements. A more formal review will take place on an annual basis. This review will be conducted by the BoT in conjunction with our Health and Safety Consultant.

Section 10



Health and Safety Arrangements

Monitoring of Arrangements

WORKPLACE SAFETY INSPECTIONS

OBJECTIVE

To measure the safety performance through a programme of active and reactive monitoring, to enable the necessary preventative and corrective actions to be taken.

To identify potential failings in the Health and Safety Arrangements in order to implement effective corrective and preventative actions.

ARRANGEMENTS

We shall measure our Health and Safety Performance to assess how effectively we are controlling risks, and how well we are developing a positive health and safety culture.

Measurement is a key step in any management process and forms the basis of continual improvement. If measurement is not carried out correctly, the effectiveness of the health and safety management arrangements are undermined and there is no reliable evidence to inform us how well the health and safety risks are controlled.

We will undertake two types of monitoring. By measuring safety performance through means of:

- **Active systems** which will monitor operation of management arrangements, Risk Control Systems and workplace precautions. Active monitoring will provide us with feedback on Comrie Development Trust performance **before** an accident, incident or ill health.
- **Reactive systems** which monitor accidents, ill health, incidents and other evidence of other deficient health and safety performance.

Routine inspections of the workplace, plant and equipment is carried out by Managers and the Working Group Leaders to ensure the continued effective operation of workplace precautions.

The ad-hoc monitoring, conducted by the BoT, is developed upon a risk based approach, taking into account the following factors:

- New work activities that are being undertaken.
- Work activities being undertaken in a different area of the site, or different conditions.
- New personnel undertaking the work activities e.g. new organisation or change of personnel.
- Work activities that are innovative or novel.
- Work activities that have been identified as having the potential to cause a major accident/incident.

The programme of active monitoring includes the following:

<i>Programme of active monitoring</i>		
Frequency	Type	Conducted
Daily	Informal Safety Inspection to check Site Safety, Environmental Protection and General Housekeeping standards	Managers & Working Group Leaders to identify any hazards and prevent accidents
Monthly	Routine Internal Safety Inspection Fire Extinguisher Checks	Managers & Working Group Leaders
Annually	Monitoring Health and Safety Arrangements by examining the following records: <ul style="list-style-type: none"> • Control of Contractors • Accidents Reports • Fire Prevention • Workplace Safety Inspection 	Board of Trustees
On request	Safety Audit to collate objective information on the effectiveness of the health and safety arrangements	By Health and Safety Consultant using a Safety Audit programme.
Anytime	No notice inspection	By Enforcing Authority e.g. Fire & Rescue Service, Local Authority Environmental Health Officers or Trading Standards. As a result of an accident, complaint or a routine scheduled visit.

MONITORING & REVIEWING

The BoT, Managers and Working Group Leaders will continually monitor these arrangements. A more formal review will take place on an annual basis. This review will be conducted by the BoT, in conjunction with our Safety Consultants.

AUDITING AND REVIEWING PERFORMANCE

OBJECTIVE

To provide a structured process for collecting objective information on the efficiency, effectiveness and reliability of our Health and Safety Arrangements.

ARRANGEMENTS

A key distinction between monitoring and auditing is that monitoring can be undertaken by persons who are actively involved with the activities, whilst the auditing must be undertaken by persons who are independent of the activities.

A safety audit will look at the effectiveness of the Health and Safety Arrangements by examining records and gathering objective evidence.

A Health and Safety Consultant can, on request, conduct a Health and Safety Audit using a Risk Survey Checklist. This will be used to encourage best practice and highlight any deficiencies in our arrangements.

The safety audit will also consider the documentary arrangements of the Contractors operating within our areas of responsibility.

The findings of the audit will be documented and presented to the BoT. This will allow the BoT to determine the most cost effective approach of dealing with our health and safety issues.

MONITORING & REVIEWING

A more formal review will take place on an annual basis. This review will be conducted by the BoT, in conjunction with our Safety Consultants.