

Health & Safety, Accident & Near-Miss Policy

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Document Content

1. PURPOSE	1
1.1. Health & Safety.....	1
1.2. Near-Misses	1
2. RESPONSIBILITY	2
3. HEALTH & SAFETY	2
3.1. Practises.....	2
3.2. Associated Procedures.....	2
4. ACCIDENTS & NEAR-MISSES	2
4.1. Definitions.....	2
4.2. First Aiders & Kits	3
4.3. Documentation	3
4.4. Accident Reporting Procedure (Employees)	3
4.5. Near-Miss Reporting Procedure (Employees).....	4
4.6. Accident & Near-Miss Reporting Procedure for Visitors / Contractors	4
4.7. Lone Working	5
5. MANAGEMENT, REVIEW & COMMUNICATIONS	5
5.2. Updating Legislation.....	5
6. VERSION & REVIEW HISTORY	6

1. PURPOSE

1.1. Health & Safety

1.1.1. It is the policy of Sanderson Solutions Group PLC and its associated and subsidiary companies (together “the Company,” “Group” or “we”) to provide and maintain safe and healthy working conditions, equipment, and systems of work for all our employees, and to provide such information, training and supervision as may be needed for this purpose. The activities of the Company will be conducted in accordance with all legal and relevant statutory requirements appropriate safeguards being implemented to prevent exposing employees and visitors to the premises to risks to their health and safety.

1.1.2. The Chief Operating Officer and Facilities will actively pursue this policy. The requirements of the Health & Safety at Work Act 1974, the Management of Health & Safety at Work Regulations 1999, and all subordinate legislation of Codes of Practice and ISO45001:2018 shall be regarded as the minimum standard of safety, health, and welfare to be accepted.

1.2. Near-Misses

1.2.1. This policy outlines the procedures that are to be adopted when any employee, visitor or contractor experiences a near-miss on the premises of Sanderson Solutions Group Plc and its associated and subsidiary companies (together “the Company,” “Group,” “our” or “we”).

1.2.2.It is the policy of the Company to identify and investigate these unplanned incidents, their source and hence their underlying causes. To enable this objective to be achieved, it is imperative that all near-misses, irrespective of the size, be reported according to the laid down procedures.

2. RESPONSIBILITY

2.1.1.All employees are responsible for ensuring Health & Safety is maintained whilst in the workplace. All employees, regardless of status, found to be deliberately and consistently negligent in the performance of the Company's Safety Policies may be subject to disciplinary action.

2.1.2.Facilities are responsible for ensuring Health & Safety is maintained, and all accidents or near-misses are reported and dealt with correctly.

2.1.3.The Chief Operating Officer & Facilities shall hold periodic meetings to review the Health and Safety standards and introduce changes where appropriate.

3. HEALTH & SAFETY

3.1. Practises

3.1.1.The company maintain and strive to achieve compliant Health & Safety practises by continuous consultation and participation of workers as well as:

- Developing and implementing safe working practices and procedures in connection with the use, handling, storage and transport of articles, substances, and equipment. Regularly reviewing set objectives, policies, and procedures to achieve safe working conditions.
- Providing adequate facilities and arrangements for employees' welfare at work. Ensuring that the working environment is safe and without risk to health by e.g., controlling the emission of noise, air and water pollutants and the discharge of toxic or obnoxious wastes.
- Regularly inspecting premises, equipment and systems of work and the general working environment and reviewing information, instruction, training, and supervision for all levels of staff, with a view to continually improving controls.

3.2. Associated Procedures

3.2.1. The following procedures are key to ensure Health and Safety is maintained. These can all be found on the companies Intranet for reference:

- HS01 - Fire Emergency Procedures
- HS02 - Manual Handling Procedure
- HS03 - Visual Display Equipment Procedure
- HS04 - Safety Signs Procedure
- HS05 - Control of Visitors and Contractors Procedure
- HS08 - Slips, Trips & Falls Procedure

4. ACCIDENTS & NEAR-MISSES

4.1. Definitions

4.1.1.To avoid misunderstanding, the Company deem an Accident and Near-Miss to be defined as:

	Definition	Example
Accident	Any unplanned event that results in personnel injury/accident or damage to property or equipment	Cut Fingers, Electric shock, fainting whilst at work
Near-Miss	An unplanned event which does not cause injury or damage, but could have done so	items falling near to personnel, faulty lighting, loose wall panel

4.2. First Aiders & Kits

- 4.2.1. The company is committed to ensuring there are a suitable number of trained First Aider's available on site. Identification of these first aiders can be found in the office Kitchens.
- 4.2.2. For Clifton Down House has a number of fully stocked First Aid Kits around the office. The appointed persons will maintain the contents of the First Aid box. The names of the appointed persons are displayed on signs in the office who have access to a first aid kit.
- 4.2.3. All first aid for other offices under SSG is site specific.

4.3. Documentation

Document	Where Kept/Available	Used For
Accident Book	For Clifton Down House: <i>Hardcopy kept with reception and/or First Aider</i> For All Other Offices – <i>Contact Facilities</i>	Health & Safety requirement of recording all accidents that occur in the workplace, and where a First Aider is involved
Accident Record	The page of the Accident Book completed for each accident that occurs	A removable tab of the accident book to provide to the Facilities for record keeping, data protection purposes and reviewing
HSLOG02 - H&S Accident Log	Kept and managed by Facilities	Recording and managing all reported health & safety accidents
HSLOG01- Near-Miss Log	Kept and managed by Facilities	Recording and managing all reported near-misses
HSFOR01 – Near-Miss Form	Available on the company Intranet	Recording the details and activities completed regarding all near misses that occur in the workplace

- 4.3.1. The accident records will be reviewed regularly (after being removed from Accident Book due to data protection laws) by Senior Management to ascertain the nature of incidents which have occurred in the workplace. This review will be in addition to an individual investigation of the circumstances surrounding each incident. The same process applies for Near-Misses.

4.4. Accident Reporting Procedure (Employees)

- 4.4.1. The reason for investigating an accident is to determine: the cause or causes of the incident; to identify any risks, hazards, systems, or procedures that contributed to the incident; and to recommend corrective action to prevent similar incidents. Incidents should be investigated by people knowledgeable about the type of work involved at the time of the incident.
- 4.4.2. All personnel on site must report Accidents whilst working on behalf of the Company, however minor. To achieve this, the following procedure should be adopted (*dependant on site location*):
1. **All accidents must be reported to a First Aider, if no First Aiders available, inform Reception. (See section 4.2 for identification of who is a first aider). If urgent assistance is required, the emergency services will be contacted. The qualified person will administer as much treatment as possible until the emergency services arrive. If the injury is minor, treatment will be given.**
 2. **All accidents must be entered in the Accident Book by the attending First Aider, ensuring that all relevant details are reported as soon as possible.**
 3. **Treatment for any injury from a first-aid or the local hospital must be obtained, if applicable.**

4. The First Aider should then ensure the Accident Record is passed to Facilities for a) Data Protection and b) for filing in the H&S Accident Log
5. The First Aider & Facilities must ensure the area is made safe and poses no risk to other personnel *(except where the accident results in a major injury, in which case the scene should be fenced off and left undisturbed until advised otherwise by the enforcing authority).*
6. Facilities will then:
 - *Ensure that, where applicable, the requirements of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 are met*
 - *Where relevant report findings to the Director responsible for Health & Safety and, if necessary, instigate any remedial proceedings*
7. The Director responsible for Health & Safety will then ensure, so far as reasonably practical, that proper action is taken to help prevent reoccurrence.
8. The employee must also keep the Company informed of any after-effects, including periods of incapacity for work that results from an injury sustained during a work activity.

4.5. Near-Miss Reporting Procedure (Employees)

4.5.1. All personnel on site must report Near-Miss Incidents whilst working on behalf of the Company, however minor. To achieve this, the following procedure should be adopted:

- Near-Miss Incidents must be reported to Facilities, or if not available, inform Reception or a First Aider.
- A Near-Miss Form must be completed, and pictures taken of the area involved and hazard. If not completed by Facilities, this form and pictures must be provided to Facilities.
- Facilities shall conduct a review of the incident and establish the corrective actions required to ensure compliance and prevent re-occurrence.

4.6. Accident & Near-Miss Reporting Procedure for Visitors / Contractors

4.6.1. Any non-employee who experiences an accident or near-miss whilst on the Company's premises must report the incident immediately to the person responsible for them. If the person responsible is not available, the visitor / contractor must obtain the assistance of a responsible person to ensure that the Company's procedure is adhered to.

4.6.2. During the Company's opening hours, all injuries must be reported in the accident book, however minor. Visitors and contractors should also notify their own employer where applicable.

4.6.3. The Company takes the responsibility for notifying reportable accidents and near-misses under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995; therefore, the appropriate Manager must be informed immediately.

4.6.4. Reference the procedure: HS05 - Control of Visitors and Contractors Procedure (health & safety awareness for visitors)

4.7. Lone Working

4.7.1. Lone working occurs where a person works on site by themselves without supervision or contact with others, for example where someone stays late in the office outside normal working hours and is the last person left in the office.

4.7.2. It is Company policy that if an employee has to engage in lone working, they are required to comply with the following requirements:

- Prior to the start of any lone working, the employee must ensure they are familiar with fire exits and first aid points and any arrangements for the locking of offices in the evening.
- For any employee working alone for an extended period, it may be necessary to carry out a health and safety assessment; if in doubt as to whether this is necessary, the employee must discuss this in advance with Facilities or HR. If the work, carried out involves any manual handling this is an absolute requirement.
- The employee must make sure that at least one other person is aware of their lone working and that they are able to contact them by telephone.
- If the employee is working alone on site outside of normal office hours a 'buddy' system should be put in place, whereby they are in regular contact with another member of staff.
- During any lone working, including from home, the employee must keep in regular contact with others wherever possible and, in particular if they are working outside normal office hours, take regular breaks to refresh themselves.
- Employees should not work alone any longer than necessary.

5. MANAGEMENT, REVIEW & COMMUNICATIONS

5.1.1. Quarterly Health & Safety review meetings are held by Facilities with First Aid Teams, AED Trained personnel, and any Health & Safety representatives, to review all issues, procedures and updates regarding First Aid and Health & Safety. The meeting minutes are communicated to Senior Management.

5.1.2. Health & Safety Assessments are conducted bi-annually by Facilities and reviewed by the Senior Management Team. These assessments review the company's compliance with the following guidance:

- <http://www.communities.gov.uk/fire/firesafety/firesafetylaw/>
- www.hse.gov.uk/riddor

5.2. Updating Legislation

5.2.1. The companies Legislation Register contained in the IMS, defines the Health and Safety regulatory framework within which the Company is allowed to operate. It must therefore take account of the activities of the various regulatory bodies which control a broad range of topics concerned with health and safety protection.

5.2.2. The Internal Compliance Manager, with the assistance from Facilities, are responsible for identifying appropriate relevant H&S legislation, compiling, maintaining, and updating the Register.

5.2.3. Sources of information for completing and maintaining the Register could include:

- The Authorities
- Local Authorities
- Technical Journals
- Croner (or similar publications)
- New regulations

5.2.4. The Internal Compliance Manager may update the Register at any time. There will also be an annual review during the Management review meeting.

6. VERSION & REVIEW HISTORY

Version	Change Owner	Change Date	Change Description
1.2	Alex Bolland	18/07/2018	New format
1.2.1	Richard Hoyle	03/09/2019	Revert to Old Format
1.3	Richard Hoyle	22/11/2019	Rebrand and Review
1.4	Anya Burton	30/08/20	Review. Change of Policy Owner and contacts for reporting
1.5	Nicky Garratt / Anya Burton	24/11/21	Review, change of policy owner and contacts for reporting
1.6	Nicky Garratt & Nicola Price	16/11/2022	Combined the H&S Policy and Incident/Near-Miss Policy together. Re-formatting of document structure
1.7	Nicky Garratt	11/09/2023	Added in Lone Working section 4.7. Updated responsibilities from Facilities Manager to reference of Facilities as a department/team