



Property Support Services

**PSS Group's  
Health and Safety Management System**

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## 1 Introduction

In compliance with the requirement of Section 2 (3) of the Health and Safety at Work etc. Act 1974, Property Support Services (UK) Ltd. (PSS Group) are effectively complying with its statutory duties by preparing a written Health and Safety Policy.

A copy of the policy, which outlines the Company's health and safety arrangements and organisational structure, is provided at the company premises that must be read by all employees and any other interested person who may be affected by their work activities.

In order for PSS Group to comply its statutory duties, employees are required by law, to co-operate with the management in all matters concerning the health, safety and welfare of themselves and any other person who may be affected by their acts or omissions whilst at work.

The Health and Safety Management System for PSS Group is kept in the head office, 3B Basons Yard, High Street, Ongar, Essex CM5 9AA and is available for inspection by any interested party upon any reasonable request.

PSS Group agree that in order to ensure that the health and safety policy is sustained in an effective condition, it is essential that the information is up-to-date and accurate. It is the responsibility of the Managing Director to ensure that suitable revisions are made that reflect changes that have taken place within the company. In addition, the policy will be reviewed if there are reasons to suspect that is no longer valid.

PSS Group encourages all employees to inform their immediate superior of any areas of the health and safety policy that they feel are inadequate to ensure that the policy is maintained as a true working document.

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## 2 Health and Safety Policy Statement

Property Support Services (UK) Ltd. is committed to providing a safe and healthy workplace for all its employees and other parties who may be affected by its activities and to the prevention of injury and ill health and continual improvement in occupational health and safety management and performance.

Property Support Services (UK) Ltd. is also committed to complying with applicable legal requirements and with other requirements such as ISO45001:2018 to which PSS Property Support Services (UK) Ltd. subscribes that relate to its occupational health and safety hazards highlighted by its risk assessments, which will eliminate hazards and reduce risks.

These commitments are underlined by Senior Management who has the overall responsibility for policy formulation, policy implementation and on-going policy development and review.

It is the intention of Property Support Services (UK) Ltd. to place health and safety as a high priority in relation to Property Support Services (UK) Ltd.'s overall aims and objectives.

It is Property Support Services (UK) Ltd. Policy to:

- Provide the appropriate financial and physical resources.
- Provide suitable arrangements for communicating health and safety matters.
- Plan regular reviews and develop the policy.
- Identify legal requirements as a minimum acceptable level of health and safety performance.
- Provide safe systems of work.
- Provide and maintain safe plant and equipment.
- Provide a safe place of work with safe access and egress.
- Provide for the safe use, handling, storage and transport of all articles and substances used.
- Provide a safe working environment
- Provide adequate and sufficient information, instruction, training, participation, consultation and supervision.

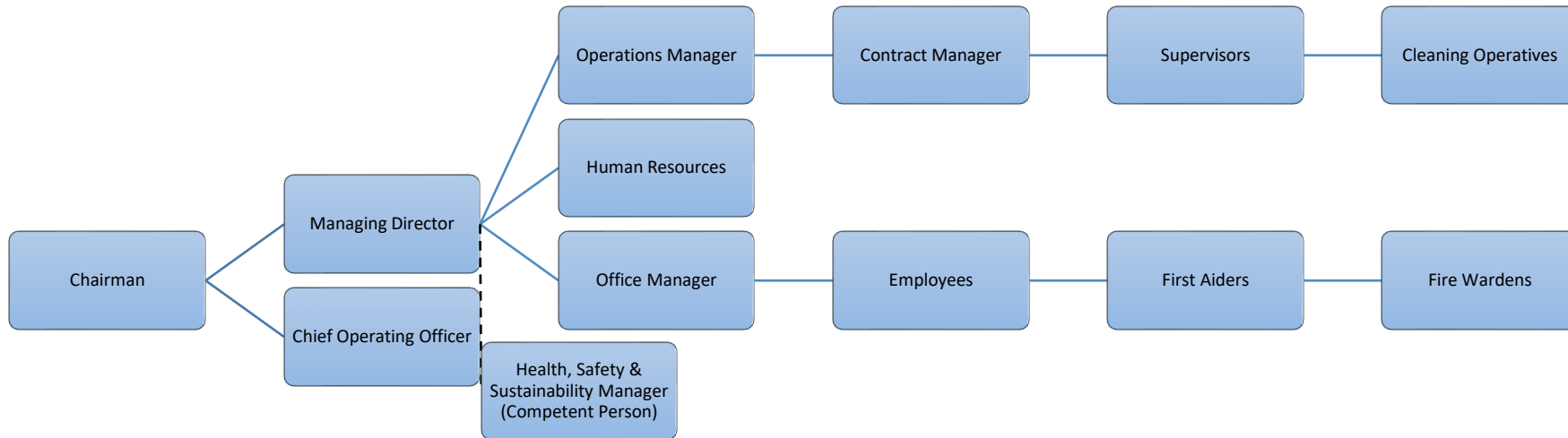
Property Support Services (UK) Ltd. acknowledges the requirements under the Health and Safety at Work etc. Act 1974 and with other requirements to which Property Support Services (UK) Ltd. subscribes and reminds all its employees of their responsibilities for their own and other people's health and safety under the 1974 Act.

**Signed:**  **Date:** 24/07/2024  
**Title:** Managing Director **Name:** Mike Jones

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### 3 Health and safety Organigram and Responsibilities

#### 3.1 Health and Safety Organigram



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### 3.1.1 *Chairman*

The Chairman has overall and final accountability for health and safety within PSS Group. It is their responsibility for:

1. Ensure that adequate resources are provided to implement the policy.
2. Ensure that the Health and Safety Management System is kept up to date.
3. Ensure that there the implementation of the policy and Health and Safety Management System seek improvements in health and safety performance.
4. Ensure that there is adequate provision for the planning, organisation, monitoring and review of the Health and Safety Management System.
5. Ensure that there is the means for control, communication, co-operation and co-ordination within PSS Group for implementing the policy.
6. Ensure health and safety compliance at PSS Group and ensuring that all legal obligations are met.
7. Ensure health and safety management and governance is integrated fully into PSS Group's main governance structures.

### 3.1.2 *Managing Director*

The Managing Director has responsibility to: -

1. Set policy and monitor compliance.
2. Support the Health and Safety Policy Statement by showing commitment to this policy.
3. Ensure that the policy is implemented fully throughout PSS Group.
4. Ensuring that the day-to-day objectives of PSS Group take into account health and safety.
5. Ensuring commitment to health and safety flows downwards throughout the organisation to its suppliers (including Contractors and Sub-Contractors).
6. Ensuring that budgets for finance and resources are made available as appropriate for Health and Safety to meet the required level of performance.
7. Ensure that the policy is regularly reviewed and developed where appropriate.
8. Ensure that adequate resources are provided to implement the policy.
9. Ensure that the Health and Safety Management System is kept up to date.
10. Ensure that there the implementation of the policy and Health and Safety Management System seek improvements in health and safety performance.
11. Ensure that there is adequate provision for the planning, organisation, monitoring and review of the Health and Safety Management System.
12. Ensure that there is the means for control, communication, co-operation and co-ordination within PSS Group for implementing the policy.
13. Ensure health and safety compliance at PSS Group and ensuring that all legal obligations are met.
14. Ensure health and safety management and governance is integrated fully into PSS Group's main governance structures.
15. Ensuring that the day-to-day objectives of PSS Group take into account health and safety.
16. Approval of the Health and Safety Policy.
17. Ensuring that the provision and maintenance of plant and systems of work that are within PSS Group's Offices are, so far as is reasonably practicable, safe and without risks to health.

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- 18. Ensuring that the provision and maintenance of a working environment for PSS Group’s employees that is, so far as is reasonably practicable, safe, without risks to health, and adequate as regards facilities and arrangements for their welfare at work.
- 19. Ensures that adequate insurance is in place.
- 20. Ensures that the Health and Safety Management review findings are provided to the Chairman on a six-monthly basis, so the Managing Director & Chairman can make well informed decisions.

**3.1.3 Chief Operating Officer**

The Chief Operating Officer is responsible for:-

- 1. Ensuring that the day-to-day objectives of PSS Group take into account health and safety.
- 2. Ensuring commitment to health and safety flows downwards throughout the organisation to its suppliers (including Contractors and Sub-Contractors).
- 3. Ensuring that the provision and maintenance of plant and systems of work that are within PSS Group’s Offices are, so far as is reasonably practicable, safe and without risks to health.
- 4. Ensuring that the provision and maintenance of a working environment for PSS Group’s employees that is, so far as is reasonably practicable, safe, without risks to health, and adequate as regards facilities and arrangements for their welfare at work.
- 5. Ensures that the Health and Safety Management review findings are provided to the Managing Director on a six-monthly basis, so the Managing Director & Chairman can make well informed decisions.

**3.1.4 Office Manager**

The Office Manager is responsible for:-

- 1. Ensuring that the day to day objectives of PSS Group take into account health and safety.
- 2. Ensuring that commitment to health and safety flows downwards throughout the office based employees.
- 3. Ensuring that systems and procedures are in place to ensure that all office based employees fully understand, observe and implement PSS Group’s Health and Safety Policy and their delegated responsibilities.
- 4. Ensures that PSS Group takes into account their office based employees’ capabilities, qualities and time when delegating tasks and activities.
- 5. Ensures that the culture within the PSS Group reflects PSS Group’s commitment to providing a healthy and safe working environment.

**3.1.5 Health, Safety and Sustainability Manager**

As the “Competent Person”, the Health, Safety and Sustainability Manager is responsible for:-

- 1. Ensuring that the day to day objectives of PSS Group take into account health and safety.

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2. Ensuring that arrangements are in place within PSS Group's Offices for, so far as is reasonably practicable, the safe use, handling, storage and transport of articles and substances.
3. Ensuring that systems and procedures are in place to ensure that all employees fully understand, observe and implement PSS Group's Health and Safety Policy and their delegated responsibilities.
4. Ensuring Health and Safety is a standard topic during management and operations meetings.
5. Ensuring that internal audits of the Health and Safety Management System are undertaken at planned intervals to determine whether the system conforms to planned arrangements for health and safety management; has been properly implemented and is maintained and is effective in meeting PSS Group's policy and management objectives.
6. Ensure that the Managing Director is provided with information on the results of such audits.
7. Develop, implement and maintain the PSS Group Asset Register, this should include the servicing contract agreements, dates and PAT testing certificates per contract.
8. Ensuring that all H&S training needs are being met by the Operations Teams and that all training Matrixes are up to date and complete.
9. When assigned to arrange maintenance works, or inspect works in progress, to ensure that all works undertaken on the site are subject to review of RAMS and issue of a Permit to Work, in accordance with the PSS systems and procedures.
10. Liaising with the Contract Managers on all additional, periodic and/or high risk works ensure that all RAMS have been submitted on time to the client and that access arrangements are in place.
11. Ensures that the Health and Safety Management review findings are provided to the Managing Director on a six-monthly basis, so the Managing Director can make well informed decisions with the Chairman.
12. That PSS Group's contractors and service providers are discharging their services in accordance with their contracts and best practice and that they are also acting in accordance with PSS's values and expectations of behaviour and customer service.
13. That the Operations Team is compliant with all relevant statutory regulation including health & safety law etc.
14. Liaising with all staff produce the PSS monthly newsletter, containing staff interviews, cleaner of the month, general announcements H&S and product information etc.
15. Reporting accidents and occupational diseases to local authorities accordingly with Accident and reportable diseases procedures.
16. Ensuring, so far as is reasonably practicable, PSS Group's Offices are maintained and are in a condition that is safe and without risks to health and the provision and maintenance of means of access to and egress from it that are safe and without such risks.
17. Ensuring that PSS Group assesses the potential for emergency situations that impact on health and safety at its Offices and develop procedures for an effective response.
18. Advising PSS Group on all health and safety matters, at all times being mindful that all local legal and other requirements are met.
19. Monitoring accident and incident reporting across the portfolio to ensure consistent reporting in accordance with the PSS Group policies and guidelines.
20. Initiating a review of PSS Group's Health and Safety Management System and guidance documents on a regular basis.

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- 21. Attending any safety committee meeting (as requested) to provide guidance and advice as is necessary in respect of health and safety.

**3.1.6 Payroll Manager / HR**

The Payroll Manager is responsible for:-

- 1. Ensuring that the day to day objectives of PSS Group take into account health and safety.

**3.1.7 Operations Managers**

The Operations Managers are responsible for:-

- 1. Health and safety management across the Client’s Contracts including reporting on levels of compliance and management to Managing Director
- 2. Ensuring that the day to day objectives of PSS Group take into account health and safety.
- 3. Ensuring commitment to health and safety flows downwards throughout the organisation to its suppliers (including Contractors and Sub-Contractors).
- 4. Ensuring that budgets for finance and resources are made available as appropriate for Health and Safety to meet the required level of performance.
- 5. Attend the monthly operations meetings and Bi-monthly management meetings and feedback the finding to contracts managers when discussing health and safety.
- 6. Monitoring compliance and escalating where appropriate.
- 7. Providing adequate management systems and support to ensure all standards are met.
- 8. Communicating standards, requirements and providing updates on performance across the Clients’ Contracts.
- 9. Ensuring the liaison with the Clients in order to obtain relevant health and safety information from the sites namely: specific risks (e.g.: asbestos, fragile surfaces, hazards from the vicinities); access arrangements; emergency procedures; site rules, etc.
- 10. Communicate to the Contract Managers such information and ensuring that these are communicated to Supervisors.
- 11. Ensure that Consultation is completed with Contract Managers, Supervisors and Cleaning Operatives and communicate these results to the Managing Director

**3.1.8 Contract Managers**

The Contract Managers are responsible for:-

- 1. Health and safety management in respect of PSS Group’s Clients’ Contracts including reporting on levels of compliance [and management] to the Operating Managers.
- 2. Ensuring that the day to day objectives of PSS Group take into account health and safety.
- 3. Ensuring commitment to health and safety flows downwards throughout the organisation to its suppliers (Contractors and Sub-Contractors).
- 4. Ensuring that budgets for finance and resources are made available as appropriate for Health and Safety to meet the required level of performance.
- 5. Monitoring compliance and escalating instances of non-compliance where appropriate.
- 6. Providing adequate management systems and support to ensure all relevant standards are met.

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7. Communicating standards, requirements and providing updates on performance across the Clients' Contracts portfolio.
8. Communicate site specific health and safety information to Supervisors and ensuring that this information is communicated to the Cleaning Operatives, Contractors and Sub Contractors.
9. Ensuring that a Contract Information Sheet is completed per site (Form PSSOHS15/007)
10. Ensuring that the work equipment is maintained accordingly with PSS Group Policies and Manufacturers' instructions.
11. Provide Health and Safety training to Supervisors and cleaning operatives.
12. Ensure that a Personal Protective Equipment register is completed and that the equipment is inspected accordingly with manufacturers' instructions and PSS Group Policies.
13. Ensure that Consultation is completed with Supervisors and Cleaning Operatives and communicate these results to the Operations Managers.
14. Ensure each of the client's sites' site files are updated and relevant documents are replaced on subject of review.

**3.1.9 Supervisors (if a Supervisor is not assigned these responsibilities shall be undertaken by the Contract Managers)**

The Supervisors are responsible for:-

1. Ensuring that systems and procedures are in place to ensure that all employees fully understand, observe and implement PSS Group's Health and Safety Policy and their delegated responsibilities.
2. Ensuring that budgets for finance and resources are made available as appropriate for Health and Safety to meet the performance standards set in the policy.
3. Ensuring the provision of such information, instruction, training and supervision as is necessary to ensure, so far as is reasonably practicable, the health and safety at work of PSS Group's Cleaning Operatives.
4. Ensure that Consultation is completed with Cleaning Operatives and communicate these results to the Contract Managers.

**3.1.10 Office Based Employees and Cleaning Operatives**

All office based employees and cleaning operatives must:-

1. Comply with PSS Group's procedures, instructions and rules directed at meeting PSS Group's Health and Safety Policy.
2. Report any safety hazard within their work area or malfunction of any item or plant and equipment to the Health, Safety & Sustainability Manager in accordance with PSS Group's defect fault reporting procedure.
3. Comply with all written or verbal instructions given to them to ensure their personal safety and the safety of others.
4. Avoid any improvisations of any form which could create an unnecessary risk to their personal safety and to the safety of others.

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5. Use only those items of equipment or machinery they have been trained and authorised to use.
6. Report all accidents and near-misses to [management], whether injury is sustained or not.
7. Attend as requested any training course designed to enhance capabilities of health and safety.
8. Familiarise themselves with the fire evacuation procedure and the position of all fire equipment and exit routes.
9. Familiarise themselves with the names and locations of first aid personnel and appointed persons as well as the position of first aid kits.
10. Inform [management] of any possible breaches in health and safety legislation.

In addition to these responsibilities, the Health and Safety at Work etc. Act 1974 places legal duties on all employees. These include:-

**Section 7 - Health and Safety at Work etc. Act 1974**

- (a) to take reasonable care for the health and safety of themselves and of other persons who may be affected by their acts or omissions at work; and
- (b) to co-operate with PSS Group to enable them to comply with any duties or requirements imposed on them.

**Section 8 - Health and Safety at Work etc. Act 1974**

No person shall intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety or welfare in pursuance of the relevant statutory provisions.

**The Management of Health and Safety at Work Regulations 1999**

Places specific duties on employees to:

- (a) use any machinery, equipment, dangerous substances or safety devices provided to them in accordance with any training or instructions provided by PSS Group in compliance with any statutory provisions; and
- (b) inform PSS Group of any work situation which may represent a serious and imminent danger to health and safety; and

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- (c) Inform PSS Group of any matter which may represent a shortcoming in PSS Group’s arrangements for health and safety.

## 4 Arrangements

### 4.1 Risk Assessment

#### Introduction

The Management of Health and Safety at Work Regulations 1999 require all employers to make a suitable and sufficient assessment of the risks to health and safety of all employees whilst at work and any other persons not in his/her employment, but who may be affected.

It is the intention of PSS Group to undertake a risk assessment of the premises that PSS Group uses as offices and of all activities carried out by PSS Group team. Such risk assessments will be update as often as is necessary. This may be, for example, if there is a change in the relevant legislation, or a change in working practices.

The intention is that all hazards are identified and all control measures are implemented to reduce the risks. The control measures and risks associated with a building/activity or process are to be defined and suitable records kept to specify and enable control to be maintained of the risk assessment process.

In addition to the Management of Health and Safety at Work Regulations 1999, risk assessments may also be required under the following:

- Regulatory Reform (Fire Safety) Order 2005
- Control of Substances Hazardous to Health Regulations 2002
- Health and Safety (Display Screen Equipment) Regulations 1992
- Manual Handling Regulations 1992
- Noise at Work Regulations 2005
- Personal Protective Equipment at Work Regulations 1992
- Work at Height Regulations 2005
- Control of Asbestos Regulations 2012

Any risk assessment should identify the risks arising from or in connection with work. The level of detail in a risk assessment should be proportionate to the risk. Once the risks are assessed and taken into account, insignificant risks can usually be ignored, as can risks arising from routine activities which are not specific to the workplace, unless the work activity compounds or significantly alters those risks. The level of risk arising from the work activity should determine the degree of sophistication of the risk assessment.

#### Identification of Hazards and Risk Assessment Methodology

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The following risk assessment and hazard identification methodology is to be adopted for all health and safety risk assessments undertaken by PSS Group (it is accepted that in respect of risk assessments undertaken by external bodies, alternate approaches and methodology may be used/adopted).

Using the matrix and figures below, risk assessments shall consider the likelihood and possible consequences.

Figure 1 – Risk Matrix

	Slightly Harmful	Harmful	Extremely Harmful
Highly Unlikely	Trivial Risk <sub>1</sub>	Tolerable Risk <sub>2</sub>	Moderate Risk <sub>3</sub>
Unlikely	Tolerable Risk <sub>2</sub>	Moderate Risk <sub>3</sub>	Substantial Risk <sub>4</sub>
Likely	Moderate Risk <sub>3</sub>	Substantial Risk <sub>4</sub>	Intolerable Risk <sub>5</sub>

Risk Level = Likelihood x Severity of Risk

## 4.2 Controlling Risk

The principles of control are detailed below within the following hierarchy

**E** - Eliminate the hazard totally

**R** - Reduce the risk to as low a level as possible

**I** - Isolate the hazard to expose only a minimum number of people

**C** - Control the hazard: this is about taking positive steps to minimise the danger.

**P** – the use of Personal protective equipment (PPE)

**D** - Discipline: enforcing a safe system of work on site

**Please note: that the use of PPE is a last resort.**

### Procedure

The Health, Safety and Sustainability Manager shall ensure that:

1. all risk assessments are undertaken as required in accordance with the above policy and with the frequency outlined in specific policies relating to the conduct of risk assessments;
2. the above methodology and control hierarchy is adopted in the undertaking any such risk assessment;

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3. all risk assessments are recorded;
4. copies of all risk assessments are stored in the Health and Safety record system;
5. copies of such risk assessments are made available to any other relevant persons where necessary;
6. the current activities are reviewed on a regular basis to ensure that all appropriate risk assessments are completed;
7. on receipt of a report or information that suggests that a risk assessment may no longer be suitable and sufficient or that:
  - a. new hazards have been introduced; or
  - b. changes within the company structure have been made; or
  - c. feedback from monitoring activities, incident investigation, emergency situations or the results of testing of emergency procedures suggest the need for change or review; or
  - d. changes in legislation; or
  - e. external factors, for example: emerging occupational health issues; or
  - f. changes to the workforce, including the use of third party suppliers / contractors; or
  - g. changes proposed by corrective and preventive action
  - h. then a review and where appropriate a new risk assessment shall be undertaken in accordance with this procedure.
8. on completion of a risk assessment and having taken into account the existing control measures in place, determine whether the existing controls are adequate or need improving, or if new controls are required;
9. where new or improved controls are required that they are selected and determined by the principles of the hierarchy of controls and prioritised in line as detailed within the guidance above;
10. that the risk assessments are reviewed to ensure that they remain suitable and sufficient and where necessary undertake or ensure that a further suitable and sufficient risk assessment is completed;
11. all corrective and preventive action, as determined by any risk assessment, is recorded and monitored in the Health and Safety record system;
12. Where changes to the organisation become apparent (including changes to PSS Group’s structure, personnel, management system, processes or activities etc.) such changes are evaluated through hazard identification and risk assessment prior to their introduction.

### 4.3 First Aid

It’s PSS’s responsibility to ensure that there is adequate first aid arrangements at every place of work occupied by the company

#### Procedure

The Health, Safety and Sustainability Manager shall ensure that:

1. Each of PSS’s offices has an appointed person(s) for first aid. The appointed person(s) will be responsible for ensuring:
  - a) The first aid kit is adequately maintained
  - b) There is an eye wash station in place with in-date sterile solutions

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- c) They take charge following any accident or incident, this includes giving first aid treatment or calling an ambulance if necessary.
- 2. When working on other premises, on liaison with the Contract Manager(s) and customer, adequate first aid arrangements are in place; first aid kit(s) along with eye wash station(s) are provided and appropriately maintained; details of any site specific first aid procedures are adhered to and appointed person(s) / qualified first aider’s details are appropriately communicated to PSS’s staff.

**4.4 Staff Welfare**

In most cases company personnel will be able to use the welfare facilities based within its customers premises, including a minimum of toilet / washing facilities and rest areas. It will be the responsibility of the Operations Manager(s) to ascertain if this is possible prior to commencement of a contract. Where not possible, the Operation(s) Manager will need to establish the location of suitable temporary or public facilities.

If the work undertaken is in residential properties, staff must make a verbal request when using washing facilities.

**4.5 Personal Protective Equipment (PPE)**

PSS will take all reasonable steps to ensure that employees are not exposed to unnecessary risks associated with their work activities. PPE will be only relied upon as a last resort or where the risk assessment has identified that it is not reasonably practicable to eliminate or control the risks by other means.

**Procedure**

The Contract(s) Manager shall:

- 1. Ensure that the relevant PPE is provided to staff free of charge
- 2. Ensure that operatives are suitably trained on the safe use, storage and maintenance of relevant equipment before issue
- 3. An issue record is kept and signed by staff, with inspection dates and the date of training given stated within it
- 4. Employees are aware to report any PPE defects found to their supervisor or directly to the Contract Manager(s)
- 5. That the PPE is always worn when carrying out work in compliance with any mandatory requirements of specific sites, risk assessments or method statements
- 6. Details of the correct PPE will made available to staff within the risk assessments and method statements relevant to the activities
- 7. No employee or contractor will be permitted to start work without the correct PPE, and necessary instruction and information to enable them to utilise the equipment effectively and without risk to their safety and health
- 8. Staff are monitored in order to ensure that they are wearing the appropriate PPE correctly
- 9. Any persons found persistently breaching PPE rules with be subject to disciplinary procedures

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## 4.6 Manual Handling

### Introduction

More than a third of lost time injuries at work are caused by manual handling activities. Simple, common sense measures can be taken to reduce these risks. The three most important steps are to:

- Follow the system of work, using handling aids properly and effectively.
- Never take personal risks by overreaching, twisting, stretching, stooping or overexerting during a handling task.
- Report any problems in the working activity or equipment as soon as these arise and ask for assistance where necessary.

### Procedure

The Office/Operation Managers shall ensure that:

1. where possible, manual handling activities are avoided;
2. where manual handling cannot be avoided, that a suitable and sufficient assessment is carried out for all manual handling operations in accordance with Form PSSOHS15/008 – Manual Handling Risk Assessment;
3. any person undertaking manual handling activities has received suitable and sufficient training;
4. where a risk of injury is identified in connection with unavoidable manual handling activities, suitable and sufficient remedial work is implemented to reduce that risk.
5. all assessments and any remedial work carried out is fully documented using the manual handling risk assessment template.
6. a suitable review of the assessment is undertaken whenever there is a change in working practices, in the legislation, or annually, whichever is the most frequent.
7. the competent person carrying out the assessment is capable of understanding the following:
  - a. the requirements of the Regulations;
  - b. the nature of the manual handling operations;
  - c. the worker's capabilities and limitations;
  - d. identification of high risk activities;
  - e. introduction of suitable and sufficient control measures.

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## 4.7 Control of Substances Hazardous to Health

### Introduction

It is PSS Group’s policy to ensure that the risks to the health of its employees and persons not in its employ arising from the use of chemicals is suitably and sufficiently controlled.

### Definitions

**Control Measure** - a measure taken to reduce exposure to a substance hazardous to health (including the provision of systems of work and supervision, the cleaning of workplaces, premises, plant and equipment, the provision and use of engineering controls and personal protective equipment);

**Hazard** - in relation to a substance, the intrinsic property of that substance which has the potential to cause harm to the health of a person, and “hazardous” shall be construed accordingly;

**Substance** - a natural or artificial substance whether in solid or liquid form or in the form of a gas or vapour (including micro-organisms);

**Substance Hazardous to Health** - a substance (including a preparation) –

(a) which is listed in Table 3.2 of part 3 of Annex VI of the CLP Regulation(b) and for which an indication of danger specified for the substance is very toxic, toxic, harmful, corrosive or irritant;

(b) for which the Health and Safety Executive(a) has approved a workplace exposure limit;

(c) which is a biological agent;

(d) which is dust of any kind, except dust which is a substance within paragraph (a) or (b) above, when present at a concentration in air equal to or greater than – (i) 10 mg/m<sup>3</sup>, as a time-weighted average over an 8-hour period, of inhalable dust; or

(ii) 4 mg/m<sup>3</sup>, as a time-weighted average over an 8-hour period, of respirable dust;

(e) which, not being a substance falling within sub-paragraphs (a) to (d), because of its chemical or toxicological properties and the way it is used or is present at the workplace creates a risk to health;

### Guidance

Using the guidance set out in the Approved Code of Practice “Control of substances hazardous to health - The Control of Substances Hazardous to Health Regulations 2002 (as amended)” (L5) with regard to the implementation of the duties imposed by those regulations and the Health and Safety at Work Etc. Act 1974 in respect of control of risks associated with the use of substances that are potentially hazardous to health.

### Procedures

The responsible person shall ensure that

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1. Any work which is liable to expose anyone to substances which are hazardous to health is not carried out unless an assessment undertaken in accordance with 4.1 Risk Assessment and 4.2 Controlling Risk Procedures of their activities has been made.
2. A suitable and sufficient evaluation of the risks to health arising from work involving substances hazardous to health is undertaken, and appropriate measures to prevent or control a risk to health are identified;
3. All identified control measures are in place before work begins, all measures, and any safe working procedures, are in place and any equipment provided is properly maintained.
4. Where appropriate, the exposure of workers is monitored and appropriate health surveillance is carried out.
5. Adequate information, instruction and training regarding the risks and precautions to be taken is provided;
6. The risk assessment is reviewed and revised as necessary.

#### **COSHH Assessment Guidance Notes**

1. The first step in any COSHH Assessment is an inventory of the substances hazardous to health. In many instances this will be a relatively simple task e.g. consideration should be given to cleaning materials.
2. Where obsolete substances are found on the premises these must be safely disposed of. It must also be remembered that substances generated by work activities e.g. dusts, fumes etc. are covered by these Regulations and must be assessed. It is, however, envisaged that the amount of dust generated during regular cleaning activities would not be sufficient to be hazardous.
3. In some situations a number of substances with very similar physical and hazardous properties, if used under similar conditions, may be grouped together to simplify the assessment process.
4. The collection of hazard data on substances is designed to produce safety sheets containing the information that employees using the substances need to know in order to identify the substance and its active ingredients, the nature of the hazard and emergency procedures.
5. There are a number of possible sources of such information. Usually the container label or hazard data sheet accompanying the product will detail this information. If this information is not supplied the supplier or manufacturer should be contacted and the necessary hazard data sheets obtained. Suppliers and manufacturers have a duty to provide such information to their customers when requested to do so. Further information may be obtained from the Health and Safety Executive Guidance Note EH40 on Occupational Exposure Limits (for respirable exposures), from your local authority or from the Competent Person.

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### How to start an Assessment

A number of steps should be followed when undertaking a COSHH Risk Assessment. They may be summarised as follows:-

1. Substance inventory;
2. Collection of hazard data information;
3. Description of use/process in which the substance is used/generated;
4. Description of existing control measures and assessment of their efficacy;
5. Training of staff;
6. Action required to minimise exposure;
7. Recording the assessment;
8. Routine review of the assessment.

The Form PSSOHS15/001 may be used to standardise the risk assessment.

### How can hazardous substances be controlled?

The guiding principle behind COSHH is to prevent employees being exposed to hazardous substances, where practicable. When this is not possible, employers should seek to minimise such exposures. The COSHH Assessment allows employers to deal with tasks on a priority basis.

A well-established set of principles, known as the "*hierarchy of controls*", should be used as a strategy for control. In many cases several methods of control may be combined to reduce exposure. This hierarchy is listed below in order of preference:

#### Exposure Prevention

1. Elimination of the use of the substance.
2. Substitution of the substance by a less hazardous one (or the same one in a different form)

#### Exposure Control

1. Total enclosure of the process or substance, e.g. through automation.
2. Alteration of system to suppress or minimise the generation of hazardous dust, fumes, microorganisms, etc. and which limit the area of contamination in the event of spills and leaks.
3. Partial enclosure with local exhaust ventilation
4. Local Exhaust Ventilation (LEV)
5. Sufficient General Ventilation

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- 6. Reduction of number of employees exposed to hazardous substances/ processes and exclusion of non-essential access
- 7. Reduce exposure time of employees
- 8. Regular cleaning and/or and disinfection of walls/surfaces
- 9. Personal Protective Equipment (PPE) e.g. the use of suitable gloves, respirators, dust masks, safety goggles etc.
- 10. Adequate facilities for washing/changing and storage of clothing

It must also be remembered that employee training and supervision is vital for any effective system of control.

Poor control can create a substantial risk even from a substance with a low hazard. With proper precautions, the risk of being harmed by even the most hazardous substance can be adequately controlled.

The Regulations recognise, however, that despite the control of substances hazardous to health, some employees will be or could be significantly exposed to such substances. In such cases employees shall be under **suitable health surveillance**.

#### 4.8 Work equipment

It is PSS Group policy to ensure that all its work equipment is inspected and maintained accordingly with the manufacturer’s instructions and applicable legal requirements.

To achieve this, the Health, Safety and Sustainability Manager, with the assistance of the Operations/Contract Managers, will ensure that there is an asset register per location/contract and ensure that the required inspections and maintenance routines are completed by a competent person.

Only trained employees will be authorised to operate work equipment. It is PSS Group policy to ensure that training is delivered if an employee, in order to fulfil their duties, requires to use a specific work equipment.

Any employee will have to complete relevant pre-checks prior to use the equipment and has the duty to report to the Operations/Contract Manager any deficiency that might present a serious risk to their safety. Each employee has also the right to stop work and leave their work area, without being disciplined if they have reasonable concerns about their safety.

#### 4.9 Work at heights

It is PSS Group policy to ensure that all risks to the health and safety of its employees, and persons not in its employ, arising from work activity at height, are adequately controlled.

The Operations/Contract Manager shall ensure that

- 1) the need to work at height is avoided wherever possible;
- 2) no employee shall undertake works above 1m unless authorised in writing;

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- 3) all work at height is properly planned, including emergency and rescue procedures, and is subject to the Permit to Work procedure;
- 4) where working at height cannot be avoided, a suitable and sufficient risk assessment is completed in accordance with Risk Assessments and Controlling Risk procedures, recorded and communicated;
- 5) with regard to the assessment, where possible appropriate work equipment or other measures to prevent falls are implemented and maintained;
- 6) where the risk of a fall cannot be eliminated, sufficient controls are implemented to minimise the distance and consequences of a fall;
- 7) any person carrying out work at height is competent to do so and have received all appropriate training, including emergency and rescue measures;
- 8) any equipment used i.e. ladders, step ladders, MEWPs etc. are all fit for purpose and subject to an appropriate programme of inspection, testing and maintenance in accordance with Work Equipment Procedure;
- 9) appropriate controls are in place to ensure that any persons working/passing below the work area are adequately protected from the risk of injury due to falling objects;
- 10) regular monitoring of the work takes place to ensure that appropriate precautions are in place and are maintained throughout the duration of the work activity.

#### 4.10 Accident Reporting

##### Introduction

All personnel on site must report accidents and near-miss incidents whilst carrying out work activities on behalf of PSS Group. The four most important steps are to:

- Make sure that all the relevant details are reported as soon as possible, in accordance with established procedures.
- Remove residual hazards that may pose a risk for other people in the area.
- Notify management of incapacity for work that results from an injury sustained during a work activity.
- Review existing systems of work to prevent a reoccurrence.

##### Procedure

All accidents and near-miss incidents must be reported to the Health, Safety and Sustainability Manager as soon as practicable, however minor. In order to achieve this, the following procedure should be adopted:

- Obtain treatment for the injury from a first aider or other appointed person.
- Make the area safe following the incident (e.g. by using barriers, warning notices), to safeguard other personnel in the vicinity (except where the accident results in a major injury, in which case the scene should be left undisturbed until advised otherwise by the enforcing authority).
- Communicate the accident to the Line Manager.

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- The Office or Operations Manager to enter details in the Health and Safety record system with the assistance of the first aider.
- Inform the injured person's manager (or a responsible person) of the incident.
- Keep the organisation informed of any after-effects of the incident, including periods of total or partial incapacity for work.
- If deemed required, an accident investigation is completed and the required remedial actions implemented and recorded on the Health and Safety record system.
- Review existing workplace risk assessments and safe systems of work in light of the accident investigation results.
- Certain accidents and incidents are reportable to the Enforcing Authority (Local authorities) under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013. This is the responsibility of the Office and Health, Safety and Sustainability Manager.

**Guidance:**

Regulation 4 (RIDDOR 2013) requires employers to report specified injuries:

1. fractures, other than to fingers, thumbs and toes
2. amputations
3. any injury likely to lead to permanent loss of sight or reduction in sight
4. any crush injury to the head or torso causing damage to the brain or internal organs
5. serious burns (including scalding) which:
  - a. covers more than 10% of the body
  - b. causes significant damage to the eyes, respiratory system or other vital organs
6. any scalping requiring hospital treatment
7. any loss of consciousness caused by head injury or asphyxia
8. any other injury arising from working in an enclosed space which:
  - a. leads to hypothermia or heat-induced illness
  - b. requires resuscitation or admittance to hospital for more than 24 hours

In addition, any over seven day incapacitation of a worker must be reported.

**How to report**

For most types of incident, including:

- accidents resulting in the death of any person
- accidents resulting in specified injuries to workers
- non-fatal accidents requiring hospital treatment to non-workers and
- dangerous occurrences

The responsible person must notify the enforcing authority without delay, in accordance with the reporting procedure (RIDDOR 2013, Schedule 1). This is done by reporting online. Alternatively, for

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fatal accidents or accidents resulting in specified injuries to workers only, the incident can be reported by phone 0345 300 9923.

NB: A report must be received within 15 days of the incident.

For accidents resulting in the over-seven-day incapacitation of a worker, the employer must notify the enforcing authority within 15 days of the incident, using the appropriate online form.

Cases of occupational disease, including those associated with exposure to carcinogens, mutagens or biological agents, as soon as the responsible person receives a diagnosis, using the appropriate online form.

Exact legal details of the categories of injuries, diseases and dangerous occurrences that are reportable to the Health and Safety Executive (HSE) under the RIDDOR regulations are available from the Health and Safety Advisor.

**If the accident happens in Client’s premises the Operations Managers with the support of the Contract Managers and Supervisors will ensure that the Client’s procedures are followed.**

#### 4.11 Reportable diseases

Occupational diseases, once be diagnosed by a doctor, must be reported to their Line Manager as soon as practicable, however minor. In order to achieve this, the following procedure should be adopted:

- If there is any symptom of the diseases listed in the guidance bellow, the employee shall communicate to their line manager and list the symptoms
- Line manager should liaise with above manager to assess if there are suitable control measures to manage the symptoms
- The affected employee should go to a doctor to obtain a written diagnosis;
- The affected employee should provide the diagnosis in writing to their line manager.
- Health, Safety and Sustainability Manager shall report this under RIDDOR Regulation 8.
- All this information should be escalated to Managing Director and discussed in the six-monthly meeting, no matter how temporary the symptoms were.
- If deemed required health surveillance programme shall be implemented.

#### Guidance:

Regulation 8 (RIDDOR 2013) requires employers to report cases of certain diagnosed reportable diseases which are linked with occupational exposure to specified hazards. The reportable diseases and associated hazards are set out below.

1. Carpal Tunnel Syndrome: where the person’s work involves regular use of percussive or vibrating tools

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2. Cramp of the hand or forearm: where the person’s work involves prolonged periods of repetitive movement of the fingers, hand or arm
3. Occupational dermatitis: where the person’s work involves significant or regular exposure to a known skin sensitiser or irritant
4. Hand Arm Vibration Syndrome: where the person’s work involves regular use of percussive or vibrating tools, or holding materials subject to percussive processes, or processes causing vibration
5. Occupational asthma: where the person’s work involves significant or regular exposure to a known respiratory sensitiser
6. Tendonitis or tenosynovitis: in the hand or forearm, where the person’s work is physically demanding and involves frequent, repetitive movements

#### 4.12 Fire Procedures

##### Introduction

It is the responsibility of everyone to play their part in maintaining a high standard of awareness with regard to the prevention and control of risks and the following precautions should be taken:

- All fire doors must remain closed at all times other than to pass through them. They must not be propped open.
- Do not obscure fire-fighting equipment.
- All escape routes must be kept clear.
- Report any suspected fire hazards to your Fire Warden or Operations/Contract Manager immediately.

On discovery of fire, the three most important actions are, in chronological order, to:

- Raise the alarm by breaking one of the red break glass call points.
- Summon the Fire Brigade.
- Vacate the building — attempts to extinguish the fire should only be made if you have been trained and it is safe to do so.

Regular checks should be made by the Operations/Contract Manager to ensure that exits are clear and that equipment is well maintained.

##### Procedure

- Activate the nearest and/or safest fire alarm on discovery of any fire, however small. Do not wait until you have informed another person, such as a manager.
- Do not rely on automatic fire warning systems; summon the fire brigade without delay by the usual method as automatic methods of transmission can fail.
- Evacuate the building as soon as the evacuation signal is given. Do not wait to conclude meetings, telephone calls or to collect belongings.
- Only attempt to extinguish a fire if you have been trained and it is safe to do so.
- As you make your escape, close doors, particularly those designated as fire resisting doors.
- Make your way to the building fire assembly point.

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- Do not re-enter the building until the all clear is given.
- Follow the Landlord's procedures and instructions.

**If the emergency happens in Clients' premises all PSS Group employees will follow the Clients' procedures and instructions except if there are reasonable concerns about their safety.**

#### 4.13 Bomb Alert Procedures

##### Telephone Bomb Warning:

A telephone bomb warning is more likely to come through to the telephone switchboard or reception, where telephone bomb warning forms will be kept.

Should any other member of staff receive a bomb warning it is unlikely that the form will be readily available. The staff member should attempt to engage in conversation to glean as much information about the bomb as possible, particularly where it is and when it is due to go off. If possible find out who is responsible for it. Write down as much of the conversation as you can remember as well as any salient points outlined in the bomb warning form. Inform the Office/Operations Managers as soon as practicable.

Any decision to evacuate or otherwise will be taken in consultation with Senior Management and the Police.

##### Suspect Packages:

Any suspect package should be left untouched. Report the suspect package immediately to the relevant members of local security, building and operational management as soon as practicable.

The Police will be advised and a decision taken on any further action in consultation with Senior Management.

The Telephone Bomb Warning form is (Form PSSOHS15/002).

**If the threat is at Clients' premises all PSS Group employees will follow the Clients' and authorities procedures and instructions except if there are reasonable concerns about their safety.**

#### 4.14 Display Screen Equipment

##### Introduction

Display Screen Equipment (DSE) is widely used throughout the PSS Group organisation and appropriate measures shall be implemented to ensure that the risks of working with Display Screen Equipment are correctly controlled and that the ergonomic risks to occupational health are minimised. PSS Group shall ensure that all equipment provided by PSS Group is Health and Safety (Display and Screen Equipment) Regulations 1992 compliant.

The three most important steps are to:

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- Adjust furniture and equipment to suit your needs - do not adjust your own posture to suit the workstation.
- Avoid adopting a static posture and avoid prolonged DSE work without a change of activity.
- Always report problems with your furniture, equipment or health as soon as these arise.

## Procedure

The Office Manager shall ensure that:

1. Any worker who habitually uses Display Screen Equipment for a significant part of their normal work is assessed and trained in their use and that the equipment is suitably maintained;
2. All staff undertake appropriate DSE training;
3. Assessments cover all individuals who habitually use a display screen as a significant part of their normal work activity. This includes all employees, even those working from home. As a rule, an assessment must be undertaken for those individuals to whom most or all of the following apply:
  - individuals who depend on the use of a display screen to do the job;
  - individuals need significant training and/or particular skills in the use of display screen equipment to do the job;
  - the individual normally uses display screen equipment for continuous periods of one hour at a time;
  - the individual uses display screen equipment in this way more or less daily;
  - fast transfer of information between the user and screen is an important requirement of the job;
  - the performance requirements of the system demand high levels of attention and concentration by the user, for example where the consequences of error may be critical.
4. that circumstances that may give rise to the need to review an assessment are as follows:
  - a major change in the software used;
  - a major change to the hardware;
  - a major change in workstation furniture;
  - a substantial increase in the amount of time required to be spent;
  - a substantial change in other task requirements, (e.g. more speed or accuracy);
  - if the workstation is relocated;
  - if the lighting is significantly modified.
5. that the assessment is sufficient and should:-
  - be systematic and include investigation of non-obvious causes of problems. For example, poor posture may be as a result of screen reflections or glare;

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- be appropriate to the likely degree of risk. This will largely depend on the intensity or duration of the work to be undertaken, for example the need for prolonged high concentration because of particular performance requirements;
- be comprehensive and cover processes, activities, job, work, plant and individual factors;
- incorporate information provided by both the employee and the employer.

**Homeworkers shall complete a self-assessment and send a copy of the self-assessment to the Office Manager (Form PSSOHS15/003)**

#### 4.15 Control of Contractors

##### Introduction

The organisation recognises that it is responsible for its contractors when they are working on their behalf. Therefore PSS Group shall only select competent contractors and shall ensure that they provide PSS Group with information on how they will carry out the work safely.

It is PSS Group’s policy to ensure that when procuring a supplier or selecting a contractor that PSS Group will undertake suitable and sufficient checks as to the Contractors suitability and competence in respect of health and safety.

##### Procedures

The Health, Safety and Sustainability Manager shall ensure:

- a) that all Contractors receive a Health and Safety Pre-qualification Questionnaire (Form PSSOHS15/009) and submit the documents and information as detailed within the Pre-qualification Questionnaire.
- b) that all contractors receive a copy of the Company’s Health and Safety Policy;
- c) that all Contractors, before they are instructed to act on behalf of the Company, have satisfactorily met the minimum criteria in respect of pre-qualification;
- d) that on satisfactory acceptance through pre-qualification that Contractors are placed on the Pre-qualified Approved List of Contractors.
- e) Annual spot checks are completed to review relevant documentation and procedures.

#### 4.16 Asbestos

It is PSS Group’s policy to ensure that all risks associated with the presence of asbestos containing materials within the properties under its control are suitably and sufficiently controlled.

The Managing Director shall ensure that:

1. Reasonable steps are taken to identify if asbestos is present within premises for which PSS Group is the Duty holder;
2. A written register of the location and condition of asbestos and/or presumed asbestos is produced and kept up to date;

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3. A suitable and sufficient assessment of the risks to employees and persons not in PSS Group’s employment is undertaken and the significant findings are recorded and communicated to all relevant parties;
4. A written asbestos management plan is produced and maintained so as to ensure that:
  - Any asbestos (including presumed) is kept in a good state of repair;
  - Where risks are associated with the location or condition of asbestos, that it is adequately repaired and protected or, where this is impossible, removed;
  - Appropriate information on the location and condition of asbestos (including where presumed) is provided to any person who is liable to disturb it or otherwise be placed at risk.
5. All assessments and registers are subject to review on an annual basis, or if there is reason to believe that circumstances have changed so as to significantly affect the risk or control measures;
6. The condition of asbestos (including presumed) is subject to periodic assessment to identify whether its condition has deteriorated or has been damaged. The frequency of the assessment will be determined by location and other factors;
7. A suitable and sufficient written plan of work is produced for any work with asbestos, and a copy of the plan is retained for such a time as the work continues;
8. All works with asbestos are undertaken in accordance with the requirements of the Control of Asbestos Regulations 2012.

**At the Client’s premises, the Operations/Contract Manager will ensure that the Client will provide the Asbestos register to ensure that the Cleaning Operatives meet the required procedures and do not disturb any material that was identifies as to be left undisturbed.**

#### 4.17 Permit to Work

##### Introduction

It is PSS Group policy to ensure that suitable and sufficient control measures are in place for all high risk work activities and that all such activities are adequately managed as required by legislation.

**High Risk Work Activity** – work including, but not limited to work in confined spaces, work at height (above 0.75m), work in hazardous areas, work on live pressure systems and work on certain electrical systems, including any live work.

##### Procedures

The Office/Operations managers shall ensure that

1. for high hazard work including, but not necessarily limited to, work in confined spaces, work at height, work in hazardous areas, on live pressure systems and work on certain electrical systems, an appropriate Permit to Work is obtained by the person undertaking the work before the activity is begun from the responsible person (at the offices, Office manager and at the Clients’ premises, person designated by the Client);
2. the issued Permit to Work should clearly set out the work to be done, precisely where the work is to be done and the precautions to be taken, and any time restrictions and/or limitations;

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3. the Permit to Work should be supported with a current risk assessment and safe method of work;
4. the Permitted work is carried out by a suitably trained and competent person;
5. the Permit user understands the emergency procedures pertaining to the premises and time of day.

**If the High Risk Activity is to be completed in PSS Group offices Form PSSOHS15/004 will be used. If at the Client’s premises Operations Managers with the support of the Contract Managers and Supervisors will follow the Client’s procedures.**

#### 4.18 Housekeeping & Disposal of Waste

##### Introduction

Accidents happen more frequently in an uncontrolled or untidy environment. It is therefore an essential element of an accident prevention strategy to maintain a high standard of housekeeping.

##### Procedures

- All equipment and materials must be stored in a safe and secure manner.
- Access and egress routes, emergency exits, safety and fire equipment must remain unobstructed at all times.
- Regular inspections shall be carried out to ensure suitable standards are maintained.
- No hazardous waste is to be deposited in general waste bins. All hazardous waste must be disposed of in the correct manner, in strict compliance with legislative requirements; e.g.: All hazardous waste must be disposed of via a licensed, registered carrier and disposal agent.
- Recyclable materials should be deposited in the designated bins. All reasonable measures will be introduced to recycle materials wherever practicable.
- If spillages are identified these shall not be unattended until proper ways to sign these are in place.
- No waste from external sources is to be deposited in PSS Group’s waste facilities.

**At the Clients’ premises all employees shall ensure that they do not leave any substance, equipment or waste obstructing means of escape or that might present a trip hazard. Employees shall ensure as well that follow Clients’ procedures.**

#### 4.19 Staff Induction Training

##### Introduction:

All staff upon starting with the organisation will be issued with the Health and Safety Policy and have the opportunity to discuss its contents with their Line Manager.

Such training will fundamentally cover:

- Fire and emergency procedures, warning systems, actions to be taken on receiving warning, locations of exits or escape routes, evacuation and assembly procedures.

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- First Aid and injury reporting procedures, and the names of first aiders/appointed persons.
- Instruction regarding any prohibited areas.
- Manual Handling instruction.
- Display Screen Equipment guidelines.
- Any other safety precautions to be taken.

Upon completion of the initial induction, staff will be required to complete the induction checklist form (Form PSSOHS15/005).

Each member of staff that have specific health and safety duties shall have a Continual Professional Development plan (although this does not have to be documented) to ensure competence with their health and safety duties. Health and Safety training records shall be maintained by the Contract and Office Managers that should communicate these to the Health, Safety and Sustainability Manager. All records shall be retained for future reference and audit purposes.

Training records shall be recorded and maintained for company health and safety induction training, specialist health and safety training (e.g. First aid, fire warden, manual handling), safe systems of work procedures and assignment instructions, technical training and NEBOSH/IOSH training.

The Managing Director with the support of the Office, Operations and Contract Managers shall ensure that health and safety critical roles and responsibilities are resourced and discharged allowing for the provision and the dissemination of information and arrangements for the business. The Office, Operations and Contract Managers shall ensure that they monitor the performance of staff and organise their training needs in liaison with senior management, including the issue of the employee's health and safety induction and associated health and safety policies and procedures.

#### 4.20 New and Expectant Mothers

##### Introduction

PSS Group shall make a suitable and sufficient assessment of the risks to new and expectant mothers.

##### Responsibilities

When written notification is received from an employee that she is pregnant, has given birth within the previous six months or is breastfeeding, the employer shall conduct a specific risk assessment. This risk assessment will be carried out by a competent person. The risk assessment shall take into account any advice provided by the woman's GP or Midwife.

It is a requirement to identify the hazards in the workplace that could pose a health and safety risk to new and expectant mothers and take appropriate action to remove or reduce the risk.

It is recommended that when the risk assessment is carried out with the individual they are given the opportunity of discussing any concerns that they may have.

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#### 4.21 Driving at Work

##### Introduction:

It is PSS Group’s policy to ensure that where employees undertake driving activities for work that these are undertaken in a reasonably safe manner.

##### Note

Driving duties undertaken during the course of employment take on a different legal context to those undertaken outside of the work environment. In the social, domestic and pleasure context, drivers are responsible for their own actions. However, when at work, the employer/employee relationship is governed by the provisions of health and safety legislation and common law decisions. These provisions place an obligation on PSS Group to establish procedures to ensure that:

- Drivers are competent; and
- The equipment (the motor vehicle) used is maintained and, so far as is reasonably practicable, safe and without risks to health

On this basis PSS Group is likely to be primarily responsible for any acts or omissions arising from the duties carried out by their employees that result in injury or death to persons and/or damage to property whilst driving at work.

##### Definitions

**Driving at Work** - activity involving the use of a motor vehicle (propelled by petrol, diesel, electric, gas or other power source) whilst executing work on company business.

##### Guidance

###### *Journey Planning: Times and Distances*

Journeys should be planned to use the safest route for the type of vehicle used. The scheduling of journeys should be undertaken, wherever possible, to avoid when most sleep-related accidents occur (i.e. between 2 am and 6 am, and between 2 pm and 4 pm). Under no circumstances must employees drive if they feel sleepy even if this might result in delaying originally planned schedules. The Highway Code states that drivers should take a 15 minute break every two hours; drivers will need to take this into account in their journey planning

###### *Seat Belts*

Where vehicles are provided with seat belts, it is the responsibility of the driver to ensure it is used, and that they are also used by all passengers.

###### *Smoking*

In accordance with the provisions of the Health Act 2006 and British Lands Smoking Policy, smoking is prohibited in any PSS Group owned, hired or leased vehicle, together with any other vehicle (including a privately owned vehicle) in which passengers are being carried.

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*Alcohol and Drugs*

Drivers must comply with the national driving drug and alcohol legislation.

*Eyesight/Illness/Medication*

Drivers must be able to satisfy the eyesight requirements set out in the Highway Code. Furthermore, they must not drive if ill or taking medication where either condition could affect their capability to drive. If in doubt, they should arrange to discuss the matter with their General Practitioner (GP).

*Speed Limits/Restrictions*

When driving on the public highway, speed limits, as displayed, must be adhered to at all times, the only exception to this being any vehicle which, in order to conform with relevant regulations, has its speed restricted to a lower rate.

*Passenger Safety*

Drivers are responsible for ensuring the safety of their passenger(s), taking all reasonable measures. They must drive at all times in a manner that will not cause unnecessary risk and draw to the attention of passengers the need to behave in a manner that will not cause distractions to the driver. In the event that any passenger is not prepared to comply with such requirements, the driver is authorised to refuse transport to that person.

The transport of unauthorised passengers (e.g. hitch-hikers) is strictly prohibited.

*Visibility from the Driving Position*

Drivers must maintain a clear view of the road at all times, including for the purposes of reversing safely. The loading of a vehicle in such a way as to cause restricted vision is strictly prohibited.

*Mobile phones or other hand-held communication devices*

It is a statutory offence to use a mobile phone while driving (except where it is 'hands-free') and under no circumstances must the use of a hand-held phone or other hand-held communication device take place.

In recognition that hands-free mobile communication systems distract drivers and can lead to lapses in concentration and compromise control of the vehicle, the use of these systems is also prohibited while driving. It is, however, recommended that a mobile phone is taken on all business journeys.

**Procedure**

The Health, Safety and Sustainability Manager shall ensure that;

1. where appropriate a risk assessment is undertaken in respect of driving activities in accordance with 4.1. Risk assessment procedure.

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2. the competency of the employee (driver) is confirmed by ensuring that a copy of the drivers driving licence is available.
3. if the vehicle is the responsibility of the driver then the a copy of the latest valid MOT certificate is available (if appropriate).
4. if the vehicle is the responsibility of PSS Group that the vehicle is maintained and is covered by a valid and up to date MOT certificate (if appropriate).
5. if the vehicle is the responsibility of third party organisation (rental company for example) that any agreement between the third party organisation and PSS Group (or its employee) includes the requirement that the third party is responsible for providing a safe vehicle that is covered by a valid MOT certificate (if appropriate).
6. any accident involving a PSS Group owned, hired or leased vehicle, or a vehicle owned by an employee being used on company business which results in vehicle damage and/or injury to persons must be reported to HR immediately. In the event of injury to a person, the Police must be advised immediately; in each case a report should be made in accordance with 4.4. Accident Reporting Procedure.

#### 4.22 Lone Working

It is PSS Group’s policy to ensure that all employees who are required to work alone have safe working practices and adequate instruction and training.

#### Definitions

**Lone Working** – those who work by themselves without close or direct supervision.

#### Procedure

The Health, Safety and Sustainability Manager shall ensure

1. that for employees categorised as Lone Workers a Lone Working Risk Assessments is undertaken in accordance with 4.1 Risk Assessment Procedure ensuring staff are interviewed and their qualities, experience and expertise are taken into consideration.
2. that from the Risk Assessment, safe working procedures are established.
3. that those who are required to work alone should:-
  - a) be trained in the strategies for the prevention of violence;
  - b) receive instructions or have procedures in place to ensure that they can keep in contact with colleagues and have an up to date out of hours telephone numbers to summon help;
  - c) know how to report incidents;
  - d) appreciate their responsibility for their own safety;
  - e) know the fire and other emergency procedures for the building;
  - f) know the reporting procedures if a serious incident should occur;
  - g) have a good understanding of the safety guidance procedures within the Company;
  - h) ensure that a fully stocked First Aid kit is available for immediate use;
  - i) ensure that any Personal Protective Equipment supplied (any personal alarms supplied to summon help or assistance are operational) including is available for use and adequately maintained in accordance to the manufacturers’ instructions;

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## Guidance

There are many and varied situations where Lone Workers may find themselves ill at ease when working alone. Female workers are particularly vulnerable, especially when required to work late or leave the office after night fall.

## Identification Cards

- Always show your identification card (or business card) or wear it in a prominent position.
- Do not allow it out of your possession.
- Give the client time to study the ID card.

## Check for obvious dangers, for example dogs, hazard signs, etc.

### If you enter premises

- Park your vehicle in a safe and obvious place, leaving yourself a quick escape route.
- Always lock your vehicle.
- Only enter when invited and if safe to do so.

## Yourself and your environment

- Remember no one is invincible - it is folly to think it will never happen to you.
- Trust your feelings. If you feel uneasy or scared do not ignore the warnings. Act on your intuition.

## Be alert

- Walk tall: good posture and balance are positive aids to self-protection and also give you an air of self-assurance.
- Keep your mind focused on your surroundings - be aware of your environment.

## Avoid putting yourself at risk

- Do not give your home telephone number or your address to clients.
- Avoid after hours appointments.
- Do not get into a lift with anyone who makes you feel uneasy.
- Wear clothes which give out the signals you intend. We may not all want to conform to the expected professional image, but we need to be aware of the effect we create.

## Prepare yourself for the journey

- Plan your route (know where you are going and how you are going to get there).
- Tell someone where you are going.

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- Watch what you wear.
- If travelling in your own car, make sure it is well maintained and that you have enough petrol for your journey.

**Avoid risks**

- Decline offers from strangers.
- Keep to familiar roads.
- Avoid spur of the moment changes en route.

**Never think**

- It won't happen to me.
- I can cope.
- It's only a short journey.
- They look OK. Try not to judge people from their appearance.

**On foot**

- Place valuables such as wallets in an inside pocket.
- Avoid deserted places such as dark buildings, bushes, waste ground, car parks and alley ways.
- Be alert at subways. Take advantage of other people going your way.
- If you need to go through a "risk" area, think about what you would do if faced by a problem. Look for escape routes. Walk in the middle of the pavement; don't walk too close to doorways.
- If you do think you are being followed, trust your instincts and take action. As confidently as you can, cross the road, turning as you do to see if someone is behind you. If they cross towards you, re-cross again and again, keep moving. If he/she continues to follow, make for a busy area - a pub, service station, or other public premises. Go in and telephone the police and a friend. (Also tell the manager, or a cashier or anyone who is likely to help you). Try not to speed up if you think someone is following you. This is a clear indication that you are worried by it. Instead purposefully slow down if the person behind you slows down too you can be sure that he/she is following you but at the same time you will not let him/her know that you are aware of her/his presence. This will buy you more time to clear your thoughts and to plan what you are going to do.
- If a vehicle pulls up suddenly alongside you, turn and walk in the other direction - you can turn much faster than a car.
- Never accept a lift from a stranger.
- Beware of a stranger who warns you of the dangers of walking alone and then offers to accompany you. This is a ploy that some attackers have been known to use.

**By car**

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- Stay in the car as much as possible. Keep the windows closed. Keep the doors locked, if you feel safer this way. Some people prefer not to lock the drivers door in case of an accident.
- Keep bags out of sight.
- Keep your car in good working order and carry extra petrol in a special safety-approved petrol can.
- If you own a car, it is advisable to be a member of a break down organisation.
- Keep a map handy so that you don't need to stop and ask for directions.
- Have change or a phone card for a pay phone in an emergency.
- A great asset is a car phone. They are expensive, but are worth it.
- At night park in a well lit place. When you get back, check the backs seat. Have a pocket torch handy and your keys in your hand for a quick getaway.
- If you park in daylight, consider what the area will be like in the dark.
- If you are followed to your car and confronted, throw your bag or brief case to the ground. If that person intends to rob you he might just pick up the bag and go, leaving you alone. This action will also have the effect of startling him thereby giving you just a couple of seconds to gather your thoughts.

**Regular car maintenance is essential**

- Read your car maintenance manual and stick to the routine procedures for weekly and monthly maintenance.
- Regular servicing will keep your car in good mechanical order but minor problems can still occur. Don't turn a blind eye in the hope that faults will disappear. Get into the habit of carrying out routine checks to your car.
- Ensure that you always have enough petrol or diesel. (In 1991 the AA recorded 33,000 instances of drivers running out of fuel).
- Carry an emergency car kit.
- Join a motoring organisation.

**Motorways**

- Travel on motorways is becoming an increasing concern, especially when a breakdown occurs or assistance is needed. Opinions are divided as to what to do or what not to do. Use your own judgement according to the circumstances.
- Drive to an emergency telephone if you can, stopping with the front passenger door as close to the telephone as possible.
- Switch on your hazard lights; if leaving the vehicle then do so by the near side door.
- Never cross the carriageway to reach a closer telephone.
- If you cannot drive further, a marker post (every 100 metres) will point to the nearest telephone which are set 1000 metres apart. You will never need to walk further than 500 metres.
- No money is required. As soon as you lift the handset, it will start ringing in the police control room. You need not say where you are, they will know.
- Stand behind the telephone and watch out for traffic and any one approaching you. The passing traffic makes it very noisy; you may have to shout.

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- Tell the control if you are a woman on your own. They will alert a police car to check that you are OK.
- If you are by the telephone and someone stops, use the telephone to tell the police, giving them the car registration number of the car that has stopped.
- If your car is not near the telephone, note the numbers on the nearest marker post. Tell the control room the problem and have your breakdown organisation card and your car registration number ready.
- The Highway Code advises you to decide whether or not to stay in the car or stand on the verge. The Department of Transport, Police, RAC and AA’s advice is to stay on the verge, only re-entering the car if you feel in danger. Ten per cent of all fatal motorway accidents take place by the vehicle colliding with a car on the hard shoulder. Try to decide by considering all the factors: the weather, the time of day and whether or not it is dark and deserted, or busy and well lit.
- If you decide to stay on the verge, do not leave the keys in the car, lock all the car doors except the passenger door which you should leave fully open so that you can get back in quickly if you decide to. Then lock the passenger door behind you.
- When the breakdown truck arrives, check that he knows your name and that he/she has in fact been sent to you. Some break down trucks cruise, waiting to pirate custom.
- Police in some areas have found that a notice stating, “Help phone the police” placed in the back window of a car has been successful.

**Taxis and Mini Cabs**

- Mini cabs or private hire vehicles are unlicensed. Mini cab drivers are not vetted so it is advisable that you follow these guidelines.
- Make sure you have the telephone number of a reputable car company. Ask your friends for a recommendation.
- When booking your cab you must do so by telephone. Ask the company for the drivers name and a call signal. Ask what type of car it is.
- If you are calling from a public place, try to avoid doing so where someone overhears you giving your name, etc. Anyone could pull up and call “cab for Mary Smith”, so when your cab arrives check the drivers name and company.
- While you may not wish to appear unfriendly, always sit in the back.
- If you do talk to the driver, don’t give any personal details.
- If you feel uneasy with the driver, ask him to stop at a busy familiar place and get out.
- Before arriving at your destination have your money ready, leave the cab and then pay the driver.

**Beware of bogus mini cabs**

Some people falsely represent themselves as mini cab drivers in London (outside London as private hire car) with aerials on their roofs and fake handsets. They unlawfully ply for hire at busy night spots, gaining fares by calling out, “someone ordered a cab?”

**Travelling on public transport**

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Public transport is generally safe. The fear of an attack on the bus or on the train is far greater than reality.

**Safety Tips**

- Plan ahead. Have the right change for your fare so that you do not have to fumble in your bag or wallet.
- If you buy a ticket from the office, put your change/card/cheque book away safely before leaving the till.
- Consider buying a season ticket - you'll need to find your money less often.
- When getting off bus or train at night, attach yourself to groups of people also leaving. Or arrange a friend or taxi to meet you.
- Know where you are going and which stop you need. If you look at a map it shows that you don't know the area and may leave you open to dubious offers of help.

**Carry a personal alarm and know how to use it**

- When waiting for a bus at night, stand at a well-lit place near groups of people.
- On the bus sit near the driver and choose an aisle seat. On a double decker bus the lower deck is preferable.
- If there is an incident on a bus, make a fuss straight away. The driver can alert the Police or Head Office by his radio.

**On trains**

- Avoid travelling in compartments with no access to corridors and other parts of the train. These are being phased out but there are still a few left.
- Don't be afraid to pull the communication cord or alarm. No one will blame you for a genuine mistake.
- Don't hesitate to alert the guard, conductor or any railway official if you feel threatened by a fellow passenger. The staff will then keep a special eye open for you and alert the police if necessary.

**The British Transport Police**

The British Transport Police are the national police for Britain's railways including the London Underground. Whether you are the victim of a crime or need assistance or advice, they will help you efficiently and sympathetically. They can be contacted through the many offices at main stations, through Help Points on underground stations, through rail staff, through any police station or you can call them directly on 0171 - 380 1400 or by dialling 999.

*The above guidelines were adapted from the booklet "Travel safety by public transport" by the Suzy Lamplugh Trust and the Department of Transport with the co-operation of the London Underground Ltd., The Bus and Coach Council, British Rail and the British Transport Police.*

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#### 4.23 Working Abroad

It is PSS Group’s policy to ensure, so far as is reasonably practicable, the health, safety and wellbeing of its employees when undertaking work outside of the United Kingdom.

##### Procedure

The Managing Director shall ensure that

- 1) prior to business travel, employees should take all appropriate steps to ascertain the personal security and health risks of travelling to and working in the required destination, including , but not limited to the Foreign and Commonwealth Office website in relation to current risk levels in relation to international travel and the NHS Travel Information service; for information advice can be sought from;

<https://www.gov.uk/foreign-travel-advice>

<http://www.fitfortravel.nhs.uk/home.aspx>

- 2) prior to business travel, employees should complete a Working Abroad Checklist – Form PSSOHS15/010.
- 3) all employees travelling internationally on business must lodge a copy of their itinerary, with the Health, Safety and Sustainability Manager. Itinerary details submitted should include, as a minimum, dates and times, countries and details of flights and hotels to be used. **Please note: If plans change whilst in transit staff should also communicate the change to the Health, Safety and Sustainability Manager.**
- 4) up to date records of all relevant contact numbers and e-mail addresses is maintained and communicated to Health, Safety and Sustainability Manager.
- 5) prior to business travel, employees obtain appropriate guidance and assistance to ensure that they have the required immunisation status and are provided with any other necessary recommended health precautions;
- 6) upon arrival at an overseas office or hotel appropriate measures are in place for employees to familiarise themselves with the action they must take in an emergency situation such as a fire, or severe weather conditions.

#### 4.24 Occupational Health and Safety Register of Legislation and Evaluation of Compliance

##### Introduction

A current register of applicable health and safety legislation shall kept by the Health, Safety and Sustainability Manager to ensure that the organisation is compliant with its legal duties and statutory requirements.

##### Procedure

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A Register of Occupational Health and Safety Legislation (Form PSSOHS15/006) shall be maintained by the Health, Safety and Sustainability Manager to ensure compliance with current applicable health and safety law/regulations. The procedure shall apply to the recording of all occupational health and safety legislation with reference to the work aspects identified by PSS Group during the execution of the company’s undertakings.

The Health, Safety and Sustainability Manager shall maintain statutory records in the Health and Safety record system.

Health, Safety and Sustainability Manager shall ensure that all new risks/hazards associated with new operational activities/services/scope of works are reported to the Managing Director, in order that any relevant legislation and associated duties can be identified and entered into the PSS Group Register of Occupational Health and Safety Legislation. New risks identified in the regular site inspections carried out by the Office/Operations or Contract Manager or Competent Person shall be taken into consideration.

The company register shall not only include statutory requirements but shall also incorporate any requirement that the organisation subscribes including, but not limited to, relevant British Standards.

An annual review of the company’s Register of Occupational Health and Safety Legislation shall be carried out, in line with any new or significantly changed operational processes, by the Competent Person. Consideration shall also be given to any changes in applicable health and safety law and the results of any compliance requirements as defined by the internal auditing and external review processes and the realisation of additional aspects/risks/hazards.

#### 4.25 Performance Measurement and Monitoring

##### Introduction

The organisation shall monitor the health and safety performance of the business operations and its ongoing compliance with applicable health and safety legislation and objectives.

##### Procedure

The procedure shall apply to the evaluation of all relevant health and safety legislation with reference to the work aspects/risks/hazards identified by PSS Group during the execution of company’s undertakings at site level. All health and safety performance management information shall be used to monitor performance, applicable operational controls and conformity with PSS Group overall goals. This management information shall be maintained by the Health, Safety and Sustainability Manager.

The performance measurement will be completed in different depth and involving different PSS Group’s health and safety responsible persons.

##### Health and Safety Meetings

The Health and Safety meetings (which are adapted within the Management / Operations Meetings) should be chaired by the Health, Safety and Sustainability Manager and should have as attendees the

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Office Manager, Chief Operating Officer, Operations / Departmental Managers and the Managing Director.

As standard agenda, the following topics should be discussed:

1. Status of risk control (how many of the identified risks are deemed controlled and what are the roadblocks that prevent the control of the remaining risks);
2. Are there any recurring issues identified in the daily and weekly site inspections? If that is the case discussion about possible root causes and possible remedial works;
3. Incident, ill-health and absenteeism trends and if deemed required discussion of possible root cause problems and possible remedial works;
4. Status of the training need analysis implementation;
5. Employee consultation and escalation;
6. Any proposal in structural change in the business (e.g. organisational change, furniture, key procedures, etc.);
7. Legal requirements updates; and
8. AOB.

Minutes of these meetings shall be produced and record on the Health and Safety record system.

### Annual Health and Safety Performance Review

The Health and Safety annual meetings should be chaired by the Health, Safety and Sustainability Manager and should have as attendees the Managing Director, Office Manager, Operations Managers and any relevant consultants.

As standard agenda, the following topics should be discussed:

1. Status of risk control (how many of the identified risks are deemed controlled and what are the roadblocks that prevent the control of the remaining risks);
2. Are there any recurring issues identified in the daily and weekly site inspections? If that is the case discussion about possible root causes and possible remedial works;
3. Incident, ill-health and absenteeism trends and if deemed required discussion of possible root cause problems and possible remedial works;
4. Status of the training need analysis implementation;
5. Employee consultation and escalation;
6. Any proposal in structural change in the business (e.g. organisational change, furniture, key procedures, etc.);
7. Legal requirements updates;

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8. Suitability of the current Health and Safety Management system and assess the requirement to review it;
9. Following period governance and strategic direction; and
10. AOB.

Minutes of these meetings shall be produced and record on the Health and Safety record system.

#### 4.26 Communication and Consultation

##### Introduction

It is PSS Group's policy to, through the processes of communication and consultation, encourage participation in good health and safety practices and support for its Health and Safety Policy and activities.

It is the responsibility of all employees and those contracted by PSS Group, who receive communication concerning health and safety to take to take action appropriate to the communication given.

It is the responsibility of PSS Group to ensure any communication on health and safety is given in a clear and concise manner.

Information for the Health and Safety Management System will be gathered from the following sources:

- Review of legislation;
- Review of significant hazards and risks;
- Results of performance review;
- Monitoring and measurement, and;
- Other relevant information requiring communication e.g. health and safety regulators, advisory bodies, emergency services and outputs from the various health and safety related committees.

Any necessary actions arising from information gathered should be communicated to the appropriate persons with responsibility for implementing such actions.

##### Procedure

The Managing Director with the assistance of the Office, Operations and Contract Managers, Health, Safety and Sustainability Manager and supervisors shall ensure that:

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1. The Health and Safety Policy will be communicated to all PSS Group employees and other interested parties, by:
  - Providing new employees with a copy of the Health and Safety Policy; and
  - Displaying the Health and Safety Policy Statement in a prominent position within the available notice boards (PSS Group premises) or at the site pack folder in Clients’ premises.
2. The Operations and management meetings, where Health and Safety is a standard topic on the agenda, quarterly meetings shall provide the “vehicle” for two-way communication. Where appropriate minutes shall be produced for meetings and distributed appropriately.
3. Representatives from contractors and suppliers may be invited to take part in the Health and Safety meetings as appropriate.
4. A mechanism is in place to receive suggestions regarding health and safety management. All suggestions should, where appropriate, be responded to and action should be taken.
5. Formal consultation with employees is undertaken in respect of health and safety issues as required. Formal consultation is to be achieved through the various communication vehicles. These consist of:
  - The quarterly Operations and Management meetings; where health safety is key on the agenda
  - Safety and security communications by email or in the site-specific regular meetings and toolbox talks.
6. All staff are aware of the need to ensure that any correspondence on health and safety issues from external sources/interested parties shall be passed to the Health, Safety and Sustainability Manager for action as necessary.
  - All staff are also communicated to be aware that should they need to remove themselves from work situations that they consider present an imminent or serious danger to their life or health, they can without undue consequences for doing so.

*Where there may be obstacles or barriers to participation in consultation, such as language barriers, literacy barriers, or potential penalisation for communication. PSS Group shall ensure that these are removed and allowances are made.*

#### 4.27 Documentation, Control of Documents and Records

##### Introduction

The organisation shall control health and safety management system documentation to ensure clarity of communication, effective operational control and to prevent the unintended use of obsolete documents.

##### Procedure

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The procedure shall apply to occupational health and safety management policies and procedures both in hard copy and electronic copy. The Health, Safety and Sustainability Manager shall ensure that all management system procedures and associated forms (records) are legible and held in the Health and System record system and are available both electronically and in hard copy for use by the company.

Access to records is restricted in accordance with company policy and General Data Protections Regulations and The Data Protection Act (refer to GDPR policy).

**Controlled Documents**

The PSS Group Health and Safety Policy and associated safety management system documents shall be controlled documents, issued and available to staff via the secure company intranet website or by manual process according to local operating site business needs.

**Issue, Version Control and Updating of Documents**

Each original management system document shall list a title, review date, author number, and revision number and be approved and checked by the Managing Director. An example of the controlled document format is shown below:

**Retention and Disposition of Records**

All health and safety records, documents and forms will be kept for a minimum of five years. Only the PSS ‘competent person’ can authorise the disposal of any health and safety associated documents. E.g. Accident investigations, accident reports and analytics. The disposal process shall consist of the shredding of hard copies and the deletion of digital copies.

Doc Name:	Date Reviewed	Reviewed by:
Approved by:	Date Approved	Revision No. 1

Each document shall have in the second page a version history control where the described above items should be included and details with regard to original author and reasons for revision shall be described. An example of the Document Version history is displayed below.

Document Version History	
Author	

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Property Support Services

Date Originated				
Version	Date	Reason For Change	Author	Approved By:
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