Health & Safety Policy

HSN001 – Health & Safety Policy v1.15 23/04/2024
Produced by Mark Rollins-Mann, Compliance Director | Authorised by Ian O'Connor, Chief Operating Officer
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1.0 Health & Safety Policy Statement

Stroma Building Control is committed to the Health & Safety of its employees, visitors and others affected. This is achieved throughout our operations by this policy and the guidance which supports it through a documented Management System, which has been based on the requirements of ISO 45001:2015.

All Health & Safety requirements and the operated Management System apply to the activities of Stroma Building Control Ltd.

Please refer to the Stroma Building Control website www.stromabc.com for information on the services provided.

The H&S Policy is supported by ISO 9001 Quality Management System, SSIP and Constructionline Gold certification which may be required by the provision of services being offered. For further details on the specific certifications held, please refer to Appendix B.

A H&S Management System has been implemented with the objectives to manage and continuously improve Health & Safety. This information is held by the individuals concerned and their managers and is available to any employee, the public and/or interested parties on request. The overall objective is to minimise the occurrence of accidents and incidents, increase employee awareness, implement best practices where appropriate and prevent potential accidents through the introduction of risk reporting.

Stroma Building Control has defined and agreed on the key objectives as detailed below:

Competence
1. Provide training and continual professional development, so that all employees can understand the Health & Safety risks within their working environment that could affect them.
2. To make sure that everyone has the appropriate skills to carry out the job safely.

The key objectives are to:
- Ensure Directors and senior management are regularly briefed on their responsibilities to support the continual growth of Health & Safety.
- Ensure Directors and senior management receive ongoing continual professional development concerning risk management and hazard perception.
- Enhance the current risk-based training delivery to continue upskilling competence levels and awareness of all employees.
- Ensure a competent workforce is in place across the business so confidence can be gained by suppliers and clients that Stroma Building Control has an effective safety culture.
- All Registered Building Inspectors to have completed the Safety Passport training.

Leadership
1. Promote good leadership through communicating expectations and responsibilities clearly and by obtaining and listening to feedback that supports continuous improvement.
2. To recognise and reward excellence and encourage everyone to make a positive contribution to improving Health & Safety at work.

The key objectives are to:
- Maintain a health, safety and well-being approach that is understood across Stroma Building Control.
- Maintain an effective Health & Safety management system that identifies continuous improvements.
- Ensure that the primary Health and Safety risks are assessed, and the risk register is updated on a regular basis.
- Support changes in the Health & Safety approach to continue with a safety-first culture.

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- Continue to promote an "open door" culture where senior management is always available to discuss Health & Safety matters.
- Health & safety to be discussed during Board, senior management and departmental meetings to show top management commitment.

Wellbeing
1. To protect our employee's short-term and long-term occupational health conditions and mental health.
2. To provide everyone with key information which will help achieve our vision of zero harm and enable those who work for us to make lifestyle choices that can lead to long-term health benefits.

The key objectives are to:
- Ensure visibility of all policies concerning employee wellbeing services through the staff intranet and induction process.
- Ensure all staff have access to the appropriate Occupational Health medicals and tests where these are required.
- Conduct DSE workstation checklist reviews of all employees upon the start of their employment and whenever their circumstances change.
- Enhance the visibility and profile of health and wellbeing across the organisation through the escalation of health and wellbeing performance indicators.
- Use the Staff Intranet to provide employees with relevant well-being information.
- Have trained Mental Health First Aiders in place.

Safe Working Environment
1. Create safe working conditions by ensuring our Health & Safety standards are met and risks are mitigated and controlled, both across our office-based and on-site locations.
2. Provide the right equipment and facilities for employees to undertake their work.

The key objectives are to:
- Enhance visibility of Health & Safety information across all office locations providing simplified access to consistent literature.
- Conduct tests of equipment and facilities to ensure they are complying with regulatory requirements and our own procedures.
- Ensure Health & Safety is continued to be discussed at the induction stage and that it is specific to the role the employee will be undertaking.
- Encourage the reporting of near misses from all employees and proactively investigate and respond to all those reported.
- Have no reportable RIDDOR accidents and all non-reportable accidents are to be investigated with effective remedial action taken.

Effective Communication
1. To have in place a strong management system with the correct resources, effective management, employee structure and robust monitoring.

The key objectives are to:
- Use the Staff Intranet, company magazine and newsletters to provide communications to all employees and monitor the impact of these.
- Encourage employees to provide feedback on Health & Safety improvements.
- Communicate Health & Safety reportable incidents to all employees in a transparent way.
- Involve employees in Health & Safety meetings.
- Respond to all Health & Safety matters that are reported by employees in a timely manner.
- Adapt communication channels to fit the needs of employees and the subject matter being discussed.

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Continuous Performance Improvement
1. To create and maintain an environment where all employees are encouraged to challenge unsafe situations or working practices, or those that can cause harm to health or themselves, colleagues, contractors, clients or members of the public.

The key objectives are to:
*   Use technology to assist with safe business practices where possible, for example, those undertaking lone working.
*   Develop clear operating procedures for employees to work in accordance with and to fall back on when challenging situations arise.
*   Ensure all reported incidents are effectively reported and feedback is provided to all parties concerned.
*   Development of safeguarding best practices and use of notice boards, staff intranet and toolbox talks to communicate these to all employees.

This Health & Safety Policy is supported by risk-specific Policy Notes and these are available to all employees through the Staff Intranet and third parties upon request. Please refer to Appendix A for further details.

Stroma Building Control recognises that Health & Safety is an integral part of operating a great business. Achieving the highest degree of Health & Safety through continual improvement and encouraging cooperation and communication between all staff leads to continual cost-effective improvements in business performance. Compliance with legal requirements of Health & Safety is seen as a minimum requisite.

It is Stroma Building Control's policy to accept the company's duties under the Health and Safety at Work etc. Act 1974 and all other UK and local Health and Safety legislation applicable to our employees, also to ensure that work is carried out in the safest reasonably practicable manner. Stroma Building Control will ensure that adequate resources are available to ensure the success of this policy.

Stroma Building Control is not an on-site resident, does not manufacture, nor undertakes the role of a Principal Contractor under CDM. The ultimate responsibility for Health & Safety lies with the Directors; however, Health & Safety is a prime responsibility of every manager including the development, awareness, training and involvement of all people in Health & Safety matters. Adhering to Health & Safety practices is also the responsibility of everyone at Stroma Building Control.

All employees are responsible for the health, safety and welfare of themselves, visitors and the people they work with. Any neglect of Health & Safety requirements shall be treated with the utmost seriousness and can lead to disciplinary measures. It is the responsibility of Stroma Building Control to provide adequate and appropriate resources to implement this policy. The Directors shall support, advise, consider suggestions for improvement and review matters concerning this policy as necessary. Stroma Building Control is also actively involved with the Employees Health & Safety Charter.

Stroma Building Control operates under a no-blame culture in order to encourage the reporting of breaches of Health & Safety and will give support to individuals reporting accidents or near-misses. In order to comply with the Health & Safety (Consultation with Employees) Regulations 1996, Stroma Building Control will consult with all employees on matters that affect their Health & Safety.

The allocation of duties and responsibilities for Health & Safety matters and the particular arrangements, that Stroma Building Control makes to implement the policy, are set out in the Health & Safety Policy. This policy has been communicated to all employees and affected persons and is available to interested parties on request. The policy is reviewed annually to ensure that it is relevant and appropriate to Stroma Building Control and its activities. No part of the policy, or the systems and guidance that support it, shall be altered without the consent of the H&S Committee.

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Stroma Building Control will collect and use personal data for the purpose of Health & Safety matters to ensure the health, safety and welfare of its employees, contractors and others. Any use, storage and sharing of data will be in accordance with the requirements of the Data Protection Act 2018 and General Data Protection Regulation.

If matters of Health & Safety come to light that may be of interest to other parts of the Organisation, it is the duty of the Directors to make those matters known through the appropriate channels.

Mr Ian O'Connor
Chief Operating Officer
Stroma Building Control Ltd

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2.0 H&S Organisational Structure

The inter-relationship of the various parties involved in the management of safety is shown in the following diagram.

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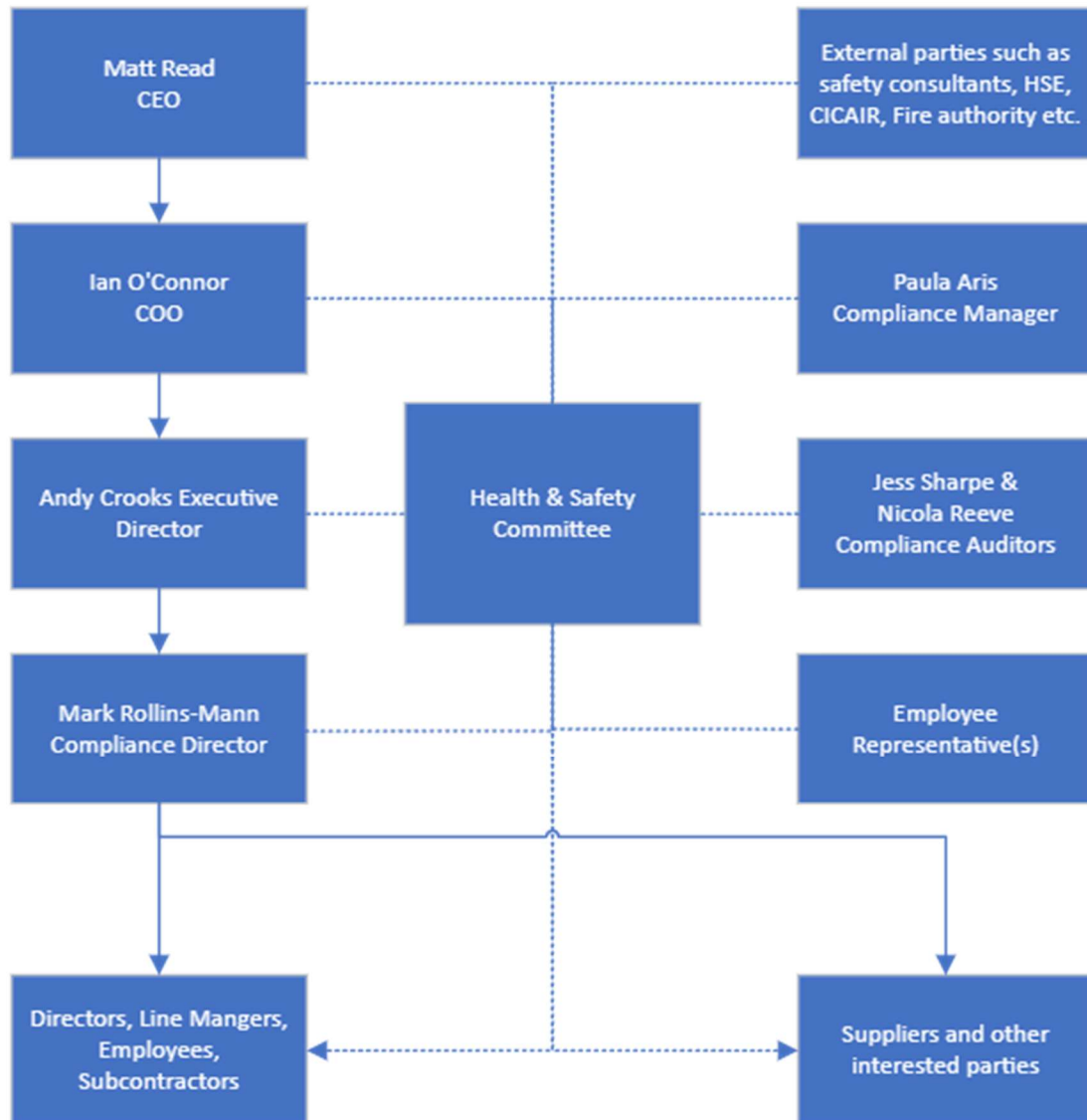
3.0 Health & Safety Organisation Responsibilities

3.1 Chief Executive Officer (CEO) and Chief Operating Officer (COO)

3.1.1 General Requirements
The CEO and COO in charge of operations are responsible for the overall effectiveness of Stroma Building Control's Health, Safety and Welfare Policy. This includes the annual review and amendment of this Policy, Policy Notes or amendments as may be necessary in light of any developments. They will ensure that regular reports are made regarding Stroma Building Control's Health & Safety performance, accident records and significant events affecting or arising out of Stroma Building Control's operations. They are also responsible for the assessment of injury, loss or damage, risks and liabilities relating to Stroma Building Control's operations and adequacy of insurance cover.

Understand and ensure that the implications and duties imposed by new Acts of Parliament, Statutory Instruments, HSE Guidance Notes and Codes of Practice are brought to the attention of the Board of Directors.

To bring company-related Health & Safety matters to the attention of the Board of Directors at regular intervals. *Maintaining and proactively managing the principal risks across the business.*

3.1.2 Ensuring Adequate Resources including Finances
CEO and COO to appoint a person(s) responsible for Health & Safety.

Ensure recourses are made available for safety measures. Arrange funds and facilities to meet the requirements of company policy and legislation.

3.1.3 Management of Health & Safety at Work Regulations 1999
To be responsible for providing adequate provisions within Stroma for the assessment of risk, preventive measures, protection, emergency procedures, adequate Health & Safety surveillance and provide employees with information and training about workplace Health & Safety.

3.1.4 Construction, Design & Management (CDM) Regulations 2015 & Guidance
Stroma Building Control does not and has not to date undertaken a role as a Principal Contractor or Principal Designer; however, if Stroma Building Control were to be appointed as a contractor on a project, we would comply with Part 4 of the CDM Regulations.

Where a Domestic Client does not make appointments the duties of the Principal Designer, Principal Contractor and Designers may fall to Stroma Building Control were engaged as part of the project (default position).

Stroma Building Control may, for specific services, be appointed as a "designer" and therefore needs to be able to demonstrate competence and awareness of the current CDM Regulations 2015. Therefore, if Stroma Building Control were appointed as a "designer" under Regulations 9 and 10 of the CDM Regulations 2015, the following would apply:

1.   Work will only start on a project, once the client has confirmed all their duties as required under the Regulations and issued a Construction Phase Plan for all projects under Regulation 12.

2.   When preparing or modifying designs, we will consider the general principles of prevention and any pre-construction information to eliminate, so far as is reasonably practicable, foreseeable risks to the health or safety of any person:
   a) Carrying out or liable to be affected by construction work.
   b) Maintaining or cleaning a structure; or
   c) Using a structure designed as a workplace.

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3.   If it is not possible to eliminate these risks, the designer must, so far as is reasonably practicable:
   a) Take steps to reduce or, if that is not possible, control the risks through the subsequent design process.
   b) Provide information about those risks to the Principal Designer; and
   c) Ensure appropriate information is included in the Health & Safety file.

4.   Stroma Building Control will take all reasonable steps to provide, with the design, sufficient information about the design, construction or maintenance of the structure, to adequately assist the client, other designers and contractors to comply with their duties under these Regulations.

5.   Provide information to the Principal Designer about those risks and any remaining risks having utilised the "general principles of prevention in design work", as outlined in the CDM Regulations 2015.

6.   The Principal Designer will make known to the Designer (Stroma Building Control) all relevant information to the project, including all pre-construction information and the communication channels required to the Principal Contractor, the Contractor and other designers as required, by the regulations, in order to fulfil duty under "providing design information".

7.   Provide information to other members of the project team to help them fulfil their duties.

Regulation 10
The Operations Manager (or any other individual nominated by the Directors and charged with running a contract) shall be responsible for planning, organising and controlling a contract from the tender stage through to completion. They shall produce a detailed and comprehensive Method Statement, Risk Assessment and COSHH Assessment if necessary. These documents shall accurately set out how resources will be organised and managed in order to minimise the risk of potential hazards to employees and others.

Note: Appointment of any contractors, suppliers or consultant's competency will be assessed, through the application of the company's procedures, relating to employment and supply of goods and services.

Sufficient financial resources shall be available throughout the contract for all necessary Health and Safety facilities including personal protective equipment.

All equipment shall be maintained in safe working order and operated correctly; all employees shall have the relevant experience, training, supervision, instruction and certification to carry out their duties.

Elements of the work that affect other parties shall be effectively coordinated with all concerned.

3.1.5 Competency of Personnel
To ensure that Senior Management's competency is adequate for the duties required of them.

3.1.6 Managers and Officer's Compliance
To ensure that competent people are given the duty of ensuring that any appointed Health & Safety Representatives, Fire Officers, First Aiders, COSHH, team members, etc., are carrying out their duties in a proper manner including if appropriate keeping the library of safety information and the COSHH files up-to-date.

Liaise with the person(s) appointed in the role to undertake inspections, audits, report recommendations, changes in legislation and advice obtained from other sources.

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3.1.7 Provision and Use of Work Equipment Regulations 1998, Lifting Operations and Lifting Equipment Regulations 1998, and Workplace Health, Safety and Welfare Regulations 1992

To ensure that competent people are given the duty of keeping in good, safe order Stroma Building Control's offices, storage areas, eating areas, toilets and washing areas, access ways, machines, equipment, vehicles, materials etc.

3.1.8 The Safety Representatives & Safety Committees Regulations 1977/ The Health & Safety (Consultation with Employees) Regulations 1996 (HSCER)

To provide arrangements for a good working relationship with the Safety Representatives and to have a Safety Committee established in accordance with the Legislation.

3.1.9 Safety Induction and Safety Awareness Training

To ensure that adequate provisions are in place for all employees, self-employed and sub-contractors, etc., to receive appropriate Safety Induction and Safety Awareness Training when they start work.

3.1.10 Safety Vetting of New Employees

To ensure that adequate safety vetting arrangements are in place for all new employees.

3.1.11 Communications

Ensure adequate means of distributing and communicating health, safety and welfare information obtained for the HSE, Safety organisations and Trade associations regarding new techniques of accident prevention, new legislation requirements and codes of practice etc.

3.2 Board of Directors and Health & Safety Committee

3.2.1 General Requirements

Stroma Building Control's CEO and COO are responsible for the effective incorporation of Stroma Building Control's Health & Safety Policy and Procedures throughout Stroma Building Control's operations. They are to apply the principles of the Policy to operations under their control and to ensure that any defects or faults brought to their attention are suitably corrected. They are to co-operate and liaise with Stroma Building Control's Health & Safety Representative(s)/ Consultants, Planning Supervisors and The Health & Safety Executive, etc., with regards to safety measures.

To bring company-related Health & Safety matters to the attention of the Board of Directors at regular intervals.

3.2.2 Manager's Awareness of Safety Standards

To be familiar with and to observe all Regulations, Codes of Practices and British Standards applicable to their work.

3.2.3 Organisation Health & Safety Policy

To be responsible for ensuring that Stroma Building Control's Health & Safety Policy is observed by the employees, consultants and suppliers under their control and that everything needed for effective compliance is provided. A copy of the Health & Safety policy will be made available in the following ways:

- Upon request from compliance@stromabc.com.
- Staff Intranet site.
- Office and Staff Intranet notice board.

3.2.4 Safety Appraisal

To be responsible for ensuring sub-contractors, self-employed persons and suppliers' safety arrangements are vetted to ensure that their safety arrangements are in accordance with the Health & Safety requirements.

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3.2.5 Provision and Use of Work Equipment Regulations 1998, Lifting Operations and Lifting Equipment Regulations 1998 and Workplace Health, Safety and Welfare Regulations 1992
To ensure compliance with the regulations at Stroma Building Control's premises.

3.2.6 Protecting the General Public
To ensure the general public is not put at any unsafe risk from Stroma Building Control's operations and that security arrangements are kept in order at all times.

3.2.7 Fire
To ensure that fire precautions and emergency evacuation procedures for Stroma Building Control's premises and places of work are maintained in order and complied with. Please refer to HSN007 - H&S Emergency Evacuation Plan and HSN006 - H&S Fire Precautions Policy for further details.

3.2.8 Health & Safety (First Aid) Regulations 1981
To ensure that First Aid and Welfare arrangements for Stroma Building Control's premises/places of work are maintained in order. Please refer to HSN008 - H&S First Aid Policy for further details.

3.2.9 Safety Inspections/ Audits
Institute an inspection procedure so that all activities under their jurisdiction are undertaken in a controlled, safe manner with due regard for statutory obligations and approved Codes of Practice.

3.2.10 Statutory Records
To ensure statutory records and reports procedures are carried out if applicable. To ensure that notification and reporting procedures to the relevant statutory authorities are carried out.

3.2.11 The Reporting of Injuries, Disease and Dangerous Occurrence Regulations 2013 (RIDDOR)
To ensure details of accidents that may occur are reported correctly regardless of whether or not such accidents involve subcontractors, employees, visitors or members of the general public and to complete any further documents as may be required by the Regulations and forward such documents to the Health & Safety Committee. They are to ensure that all accidents and dangerous occurrences are investigated thoroughly and that suitable remedial measures are taken to prevent re-occurrence. For guidance on action to be taken in the event of a reportable accident, contact your Line Manager, Employee H&S Representative or Director immediately. Please refer to HSN003 - H&S Accidents, Incidents & Near-Miss Policy for further details.

3.2.12 Displaying Statutory Information
To ensure that notices provided by Stroma are displayed in a prominent position in each managed office that are appropriate and easily accessible to all personnel concerned. As a minimum this will include the following:

- Health & Safety at Work Act 1974 (including details of safety representatives and competent persons appointed to assist with Health & Safety.
- Fire Action Notice.
- Stroma Building Control's Health & Safety Policy.
- Stroma Employers Liability Insurance Policy.
- Office First Aiders.
- Office Fire Wardens.

3.2.13 The Safety Representatives and Safety Committees Regulations 1977 Maintain a good working relationship with the Safety Representatives and Safety Committees.

3.2.14 The Health & Safety (Consultation with Employees) Regulations 1996
Assist the Directors and Safety Committee with staff consultation.

3.2.15 Client's Safety Requirements
To ensure that personnel, when visiting sites, make themselves aware of the client's safety requirements.

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3.2.16 Discipline
Reprimand and discipline any employees and consultants who are careless in their regard to their own or others' safety (see Stroma Building Control's Disciplinary Policy available on the Staff Intranet or upon request from HR).

3.2.17 Personal Protective Equipment at Work Regulations 1992
Provide appropriate protective clothing and safety equipment to employees and ensure that employees etc use protective clothing and equipment as and when required. PPE should always be regarded as the last resort to protect against risks to safety and health. Controls and safe systems of work should always be considered first.

3.2.18 Visitors, including Suppliers, Delivery Drivers, Representatives, etc
To ensure visitors, etc., are made aware of and comply with safety requirements. The person they are here to see must inform them of any office/site restrictions or specific Health & Safety requirements. Visitors must ensure that they have signed in and follow any specific office requirements e.g., wearing a visitor's badge.

3.2.19 Competency of Personnel
To be responsible for ensuring that Stroma Building Control personnel, including consultants under their control, are competent to carry out the work required of them. This includes arranging such training as may be required.

To understand and ensure, through the appointment of competent persons, that the company's responsibilities as employers under the Health and Safety at Work etc. Act 1974 and any relevant Acts of Parliament and Statutory Instruments are met.

3.2.20 Safety Induction
Responsible for ensuring that all Stroma Building Control personnel, which includes subcontractors and self-employed persons, receive a Safety Induction where appropriate before starting work.

3.2.21 Assessments
To be responsible for ensuring that all appropriate assessments are carried out for the operations under their control, i.e., Risk Assessments, COSHH Assessments, Manual Handling Assessments, Noise Assessments, Display Screen Equipment, etc. Health & Safety risks must be reduced to a practical minimum. These assessments shall be the basis of a Safe Method of Work Statement if that is required. For guidance and assistance contact your Line Manager, Employee H&S Representative or Director.

3.2.22 Risk Assessment and Method Statement, Safety Data Sheets etc.
To instruct employees in precise terms as to work methods. This should outline the hazards associated with the job and detail any safety provisions required.

3.2.23 Welfare Facilities
To ensure toilets and washing facilities, etc. are adequate and kept clean.

3.3 Employees/ Self-Employed & Consultants

3.3.1 Health & Safety at Work etc. Act 1974
It is the duty of every employee whilst at work to take reasonable care for the Health & Safety of themselves and others who may be affected by their acts or omissions. They are to cooperate as far as necessary with their employer and clients in respect of any duties or requirements imposed under any of the relevant statutory provisions. No one shall intentionally or recklessly interfere with or misuse anything provided in the interest of health, safety or welfare.

3.3.2 Organisation Health & Safety Policy
Read and ensure that they understand Stroma Building Control's Health & Safety Policy and carry out work in accordance with the Policy and legal requirements.

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3.3.3 Safety Induction

This shall be given to each employee when they start work and which will include details of Stroma Building Control's Health & Safety Policy and details regarding the Health & Safety requirements of their job.

3.3.4 Risk Assessment and Method Statement (RAMS)

Ensure they understand the RAMS for the tasks they undertake. Whenever they are not sure of particular safety requirements, they are required to ask their Line Manager for clarification.

3.3.5 Control of Substances Hazardous to Health

Before using substances that could be hazardous to their health, ensure they understand the requirements of the safety data sheets and COSHH Assessments.

3.3.6 Reporting Hazards

To report all near-misses, incidents and accidents to Stroma Building Control's Health & Safety Representative(s)/ Management and if required by RIDDOR Regulations 2013 to the Health & Safety Executive. Please refer to HSN003 - H&S Near-Miss, Incident and Accidents Policy for further details.

3.3.7 Injuries

Any injury must be reported to their Line Manager, another Manager or the appropriate site person immediately.

3.3.8 Personal Protective Equipment at Work Regulations 1992

Employees are to wear all appropriate safety clothing/ equipment as and when required.

3.3.9 Work in a Safe Manner at all times

Employees must not take risks that could endanger their life or others. Employees must not play potentially dangerous practical jokes, engage in risky horseplay or otherwise indulge in reckless or careless behaviour.

3.3.10 Alcohol, Drugs, Smoking

Stroma Building Control's HSN004 - H&S Drug and Alcohol Policy is in place and can be found on the staff intranet or upon request from HR.

3.4 External Consultants & Contractors

Where required Stroma Building Control will use external consultants and/ or contractors to undertake to carry out work. This section sets out its requirements for them.

3.4.1 General Requirements

To carry out their work efficiently and safely and strictly in accordance with the requirements of The Health & Safety at Work etc., Act 1974 and all other statutory requirements, Approved Codes of Practices. To produce safety procedures for their operations incorporating their own Organisation's Health & Safety Policy.

3.4.2 Carry out a Risk Assessment

For the works that they will be engaged in outlining the hazards associated with the works and detailing the safety provisions required.

3.4.3 Risk Assessment and Method Statements (RAMS)

To produce and submit RAMS detailing the Method of Work and the Safety Precautions that will be required to be taken in accordance with the Risk Assessment or to work in accordance with Stroma Building Controls RAMS.

3.4.4 COSHH

To provide full COSHH assessment information on any hazards associated with materials they may use before starting work for Stroma. Please refer to HSN005 - H&S COSHH Policy for further details.

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3.4.5 Appoint a Safety Supervisor
To appoint a safety supervisor to ensure that work is carried out in accordance with the works safety procedures and encourage good safety practices when undertaking their work.

3.4.6 First Aid and Welfare Facilities
Set up and maintain an efficient and adequate system of first aid and welfare facilities for their employees unless shared welfare facilities are provided by others.

3.4.7 Working Relationship
Maintain good, safe working relationships with Stroma Building Control's Employees, Clients/ Planning Supervisors and fellow Consultants/ Contractors. To ensure that their actions do not result in hazardous conditions for other persons who may be working in the same area.

3.4.8 Co-operation
Co-operate with Stroma Building Control's Management and Health & Safety Representative(s). To maintain good working relationships with safety representatives and safety committees.

3.4.9 Competency of Personnel
To ensure work is carried out by suitable and competent operatives and ensure that they are properly supervised and trained.

3.4.10 Safety Induction
Stroma requires all employees of Contractors to receive Safety Induction when they start work.

3.4.11 Discipline
Reprimand and discipline any of their employees who are careless in regard to their own or others' safety. (Note: Stroma Building Control will not hesitate to instruct the removal from works of offenders when that is appropriate).

3.4.12 Personal Protective Equipment and Clothing
Provide appropriate protective clothing and safety equipment and ensure their employees use this at all times when required.

3.4.13 Statutory Registers and Forms
To complete all statutory registers and forms.

3.4.14 Reporting Near-Misses, Incidents and Accidents
To report all near-misses, incidents and accidents to Stroma Building Control's Health & Safety Representatives/ Management and if required by RIDDOR Regulations 2013 to the Health & Safety Executive. Please refer to HSN003 - H&S Accident, Incident & Near-Miss Policy for further details.

3.5 Human Resources (HR)
Human Resources are involved to advise Stroma Building Control on Health & Safety matters concerning the well-being of employees and any other related matters that cross over with HR duties.

3.7 Health & Safety Consultants
Health & Safety consultants are contracted to advise Stroma Building Control on Health & Safety matters. The contact details for our H&S consultant are:

Callidus Health & Safety Ltd
Daren Lawson
07931 154575

Where instructed by Stroma Building Control, they will be asked to carry out the following duties, otherwise, these duties will be conducted by a Stroma Building Control employee.

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3.7.1 Health & Safety Inspections
Monitor by inspection, of the workplaces the Health & Safety performance of employees and provide regular feedback on such inspections and other monitoring activities to the Senior Management.

3.7.2 Statistical analysis
To prepare statistical analysis in accidents and causation classification, with recommendations on preventative measures.

3.7.3 Investigate and Report Accidents
Investigate and report on major injuries, notifiable dangerous occurrences, serious occupational ill-health and other accidents and incidents and attend and report on legal proceedings in which Stroma Building Control, External Consultants or Contractors may be involved.

3.7.4 Promoting Safety
Promote good working relations with the Health & Safety Executive and other enforcing authorities and strive at all times to achieve compliance with current legislation.

3.7.5 Competent Person
Act in the role of a competent person providing advice, guidance, and independent input/reviews.

3.8 Visitors and Other Persons
A sheet has been prepared containing advice for visitors. This shall be kept in each office and visitors should be asked to read, and abide by, the information on it.

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4.0 Arrangements

4.1 Approach

4.1.1 Control

Stroma Culture
- Stroma Building Control will strive to reduce the frequency of incidents/ accidents to achieve a safer working environment for all its employees and those affected by its activities.
- Stroma Building Control will seek to raise the profile of Health & Safety and proactively encourage a blame-free and zero-tolerance culture.
- Stroma Building Control continually reviews and improves the Health & Safety policies, processes and procedures to support the culture.

4.1.2 Co-operation

Employee Consultation
- Stroma Building Control actively encourages and supports consultation with all employees and operates an open-door policy to encourage employees to talk to their Line Managers and/ or Employee Health & Safety Representative at any time on matters of Health & Safety, within a blame-free culture.
- Health & Safety Workshops will be held from time to time, to enable employees to take an active part in the continuous improvement of Stroma Building Control's procedures and policies.
- The Directors will proactively liaise with all employees.
- Employees will be encouraged to provide initiatives, ideas and comments, which will be forwarded to the Health & Safety Committee to progress.
- Employees will be asked to complete the H&S Employee Survey on an annual basis in order to measure the effectiveness of Health & Safety delivery and awareness.

Stroma Building Control consults employees on:
- The introduction of any measure at the workplace which may affect the Health & Safety of the employees.
- The arrangements for appointing or nominating persons competent enough to assist Stroma Building Control in undertaking the measures needed to comply with the requirements and prohibitions imposed on Stroma by or under statutory relevant provisions.
- The arrangements for appointing or nominating a sufficient number of persons competent enough to implement procedures appropriate to be followed in the event of serious and imminent danger and insofar as they relate to the evacuation from the premises of persons at work.
- Any Health & Safety information that it is required to provide to those employees by or under the relevant statutory provisions.
- The planning and organisation of any Health & Safety training required to be provided to employees by or under relevant statutory provisions.
- The Health & Safety consequences of the introduction (and planning thereof) of new technologies into the workplace.

When Stroma decides to elect a representative for employee consultation, Stroma Building Control ensures that:
- Employees are informed of the name(s) of the representative(s).
- Employees are informed of the employees represented by the representative.

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4.1.3 Communication

Health & Safety Representation
The objectives of the H&S Representative are:

- o To provide a forum for the discussion and consideration of all aspects of Health, Safety, Environmental and Welfare in Stroma activities.
- o To provide direction on the policy, standards, training, competency and implementation of the Health & Safety system.
- o To be a communication vehicle for employees on matters of Health & Safety.
- o To monitor accidents, incidents and near misses identifying trends.
- o To monitor health issues and determine whether any trends indicate ill health arising from work activities.
- o To study accidents and notifiable disease statistics to enable reports to be made for recommended remedial actions.
- o The examination of Health & Safety audits and statutory inspection reports.
- o To consider reports from the external enforcement agency.
- o To review new legislation, approved code of practice and guidance and the effect on the organisation.
- o To monitor and review all Health & Safety training and instruction activities in the organisation.
- o To monitor and review all Health & Safety publicity and communication throughout the organisation.
- o The development of safe systems or work and safety procedures
- o To review risk assessments and take into consideration reports from safety representatives.
- o The continuous monitoring of arrangements for Health & Safety and revising them where necessary.

- • The HSS Committee will meet on at least a quarterly basis to ensure that arrangements exist for obtaining and communicating with employees.
- • Prior to each meeting, staff will be invited to submit any issues to the HSS Committee that they want to be considered at the same time be reminded who the members of the committee are.
- • Minutes of the HSS Committee meeting is to be made available to staff after the meeting upon request.
- • To establish the requirements to elect an employee representative or representatives based on the elected representative changing jobs or standing down, business re-structure and/or major changes to the divisions/constituency or if there has not been an election for some time.

Visual Behaviour
- • Directors, senior managers and managers will demonstrate their commitment and interest in Health & Safety by setting an example and being proactive in focusing attention on current priorities in the improvement of Health & Safety in Stroma Building Control.
- • Directors, senior managers and managers will support the H&S Committee and will take an active involvement in investigations of accidents, ill health and incidents, depending on the potential severity of the event.

Written Communication
- • Stroma Building Control uses this Health & Safety Policy and supporting Policy Notes to communicate the requirements for Health & Safety.
- • Stroma Building Control uses the Staff Intranet, company magazine newsletters, e-mails and Stroma computer network drives, as a medium for advising employees on Health & Safety matters. All employees are informed about their Health & Safety obligations and where they can obtain a hard copy of the Health & Safety Policy, upon joining Stroma and when it is significantly amended. All documents can be printed from computer network drives.

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- Employees are advised of changes required in working practices, through the issued emails and news items on the Staff Intranet (arising out of changes in legislation, approved codes of practice within the industry and from trends established within in Stroma Building Control).

Face-to-face discussions
- Opportunities for employees to have face-to-face discussions on Health & Safety include routine management meetings at all levels within Stroma where Health & Safety is an agenda item.
- Staff can discuss Health & Safety issues with the company Directors and Health & Safety Representatives on their regular visits to offices.
- The Employee Health & Safety representatives will attend HSS Committee meetings to have the opportunity to discuss issues face to face. Any employee is able to attend or where not possible their question or concern can be discussed, and a response issued.

4.1.4 Competence

Stroma Building Control provides employees with the appropriate level of competence throughout its organisation. This will be achieved through a mixture of appropriate recruitment, training, selection and development of individuals backed by advisory support.

The specific training needs of individuals will be identified in the following ways:

- Annual performance reviews for all staff.
- Pre-appointment assessments.
- Health & Safety monitoring.
- Recommendations from re-active monitoring.
- Training Matrix.

Managers at all levels are responsible for assessing and meeting the training needs of their staff. Only those contractors who have been assessed as having the appropriate competencies, including Health & Safety, are engaged to carry out work for Stroma Building Control.

The H&S Committee will be required to undertake Risk Management training.

4.2 Planning and Implementing

4.2.1 Hazard Identification
- Risk assessment methods shall be used at all workplaces and are used to set priorities and objectives for hazard elimination, and thus risk reduction, by establishing performance standards and identifying specific actions required.
- Control of risk is achieved by effective monitoring, which will be carried out by the Executive Director or the nominated person looking at the fixed elements of activities such as premises, equipment, substances, etc and the variable elements such as people, procedures and working systems.
- Hazards, which may be identified and documented as being of particular concern:
  - Manual handling.
  - Use of Display Screen Equipment.
  - Fire.
  - Electrical equipment.
  - Falls from height.
  - Slips, trips and falls.

- If adherence to a method statement is not possible in a safe manner, or the circumstances have changed, the method statement must be altered, and the new arrangements agreed upon and briefed out before the works are progressed.
- For all high-risk/ complex activities undertaken by contractors, the contractor will be expected to give a toolbox talk to the operatives involved before the works are progressed.

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4.2.2 Risk Assessments

Stroma Building Control has legal duties to take certain actions in respect of potential and actual risk. These risks will be realised by us as follows:

- Wherever a significant risk is suspected, a risk assessment sheet shall be filled in; each section is to be completed to consider the severity of the hazard, the number of people likely to be exposed, the likelihood of the occurrence and the possible consequences.
- General procedure for carrying out a risk assessment should include:
    - Identify the hazards and activities.
    - Assess the risks, i.e., what is the nature and extent of the risk?
    - Are existing control measures or precautions adequate?
    - Is there full compliance with the law?
    - Are further precautions required?
    - Record the finding on the risk assessment sheet and action plan to be implemented if necessary.
- Potential risks should be identified by:
    - Regular reviews.
    - Effective communication.
    - Assessment of the risks by good forward planning.
    - Effective and continuous monitoring of performance standards.
    - Consultation between employees at all levels.
    - Quick and effective responses when deficiencies in work systems are noted.

4.2.3 Risk Control Systems

- Written method statements shall be obtained from contractors for all activities on our premises, which may pose a risk to themselves, our staff or others; these must be 'site-specific.
- Evacuation procedures must be displayed at all offices. The evacuation process must be regularly checked and evidenced.
- All notices prohibiting smoking, naked lights etc must be strictly obeyed.
- No rubbish may be burned on premises owned, rented or hired by Stroma.
- Permits to work shall be used for high-risk activities and where work or task is complex.
- Appropriate fire extinguishers must be available in the correct locations at each office and the date must be checked for validity.
- The storage of harmful/flammable/explosive materials must be in a designated place and COSHH sheets must be available in case of accident/emergency.
- Assessments will be made on the requirements for employees' personal protective equipment before undertaking any site visit where it may be required, and Stroma Building Control ensure that appropriate protection is supplied.
- Appropriate training will be given to staff where required.

4.2.4 Resources.

Adequate resources and competent people will be provided to meet health, safety and legislative requirements.

Resources will be assessed and will be reviewed on a regular basis to ensure they are adequate at all times.

4.3 Measuring Performance

4.3.1 Monitoring Compliance

Reactive monitoring can identify failures of control, but active monitoring seeks to identify and eliminate or reduce the risk before the failure occurs. Although both types of monitoring will be necessary, Stroma Building Control focuses on active monitoring to help avoid accidents/incidents/risks.

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The active monitoring undertaken by Stroma Building Control includes the periodic examination of documents to check that systems relating to the promotion of the Health & Safety culture are complied with, and Health & Safety inspections are carried out and recorded on a 6-monthly basis in offices.

4.3.2 Key Performance Indicators (KPIs)

A number of areas will be monitored on a regular basis to provide Stroma Building Control with KPIs to review performance including the number and type of accidents; near-misses, accidents, incidents and dangerous occurrences; the results of recorded inspections and audits.

4.4 Auditing & Reviewing Performance

4.4.1 Auditing

The aims of auditing are to establish; appropriate management systems are in place; adequate risk control systems exist and are implemented, and appropriate workplace precautions are in place.

The audit process involves collecting information about the Health & Safety Management System and assessing its adequacy and performance. This is achieved by; agreeing on the objectives and scope of the audits with relevant managers and employee representatives; agreeing on the audit review documentation and plans; interviewing individuals and observing physical conditions and workplace activities; examining documents and assessing records; evaluating the information and providing audit reports.

The audit results will be used to identify; trends in Health & Safety within Stroma Building Control; the effectiveness of the Health & Safety Management System; areas for improvement from the trends and the practices adopted as a result of improvements made.

4.4.2 Reviewing Performance

The feedback from measuring performance and audits of the control systems and workplace precautions, together with other internal and external influences of good practice and legislation will be considered in reviewing performance.

Reviewing is a continual process undertaken at various levels to include responses; by managers and employees to implement workplace precautions, which they observe in their day-to-day activities; to remedy unsatisfactory performance identified by active and reactive monitoring; to the results of audits.

Reviews will be undertaken by the Health & Safety Committee on a regular basis, as required, to include all offices and Stroma Building Control as a whole.

The Health & Safety Management System, including the policy and procedures, will be reviewed annually to include an assessment of the degree of compliance with the system requirements; identification of areas where the system is absent or inadequate; assessment of the achievement of specific objectives and plans; accident, ill-health and incident data (taking into consideration the underlying causes, trends and common features).

Stroma Building Control's performance will be "benchmarked" against other similar organisations by comparison with industry standards for accident incidence and frequency rates.

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Appendix A – Health & Safety Policy Notes

Reference	Policy Note Description
HSN002	H&S Charter
HSN003	Accidents, Incidents & Near-Miss Policy
HSN004	Drug and Alcohol Policy
HSN005	COSHH Policy
HSN006	Fire Precautions Policy
HSN007	Emergency Evacuation Plan
HSN008	First Aid Policy
HSN009	Public Safety Policy
HSN010	Offices Policy
HSN011	DSE Policy
HSN012	Manual Handling Policy
HSN013	PAT Testing Policy
HSN014	Not used
HSN015	Site Visit Safety Policy
HSN016	PPE Policy
HSN017	Working at Heights Policy
HSN018	Noise Policy
HSN019	Lone Workers Policy
HSN020	Young Persons Policy
HSN021	Asbestos Policy
HSN022	Stress Policy
HSN023	Confined Spaces Policy
HSN024	Site Welfare Facilities Policy
HSN025	Legionella Policy
HSN026	Permit to Work Policy
HSN027	New & Expectant Mothers Policy
HSN028	Working at Home Policy
HSN029	Sharps and Bodily Fluids Policy
HSN030	Mental Health First Aid Policy
HSN031	Employee Representatives Policy
HSN032	Electric Vehicle Charging Policy
HSN033	Occupational Health Testing and Screening Policy
HSN034	H&S PEEPs and GEEPs Policy

Appendix B - Certifications

Awards and Certifications	Awarding Body
ISO 9001 - Quality Management System Certification	BMTRADA
ConstructionLine Gold	ConstructionLine
SSIP Health & Safety	CQMS Safety Scheme
Registered Building Control Approver	Building Safety Regulator (BSR)
Cyber Essentials Certification	Cyber Essentials

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