



Title: Health, Safety & Environmental Management

Date: 18 October 2022

Document No: XA10

Revision: 2.0

Owner: Director of Innovation (Exec Director responsible for SHE)

Approver: Head of Quality & Compliance

1. Scope

Safeguarding the health and wellbeing of everyone and safeguarding the natural environment within the BRE Group is one of the primary objectives of the BRE Group Board. The Board recognises its corporate responsibility to provide a healthy and safe environment for all employees of BRE Group companies, clients, tenants, visitors and contractors on BRE sites or working within BRE's undertaking, and understands it has statutory and other duties imposed in regards environmental protection. The Board will take all reasonable steps to fulfil their obligations. All employees will be expected to act responsibly, take all reasonable steps to prevent injury to themselves and others and contribute to the improvement of health, wellbeing and environmental issues within the BRE Group. Achieving a safe and healthy working environment, with continuous improvement in BRE's performance, is integral to everything BRE do in running our business. BRE will achieve this by implementing this policy.

This document should be read in conjunction with the BRE Group Safety, Health and Environmental Policy statement as well as document XP154 Managing SHE Risks at BRE, which sets out the way BRE approaches the management of SHE risk.

1.1 Management

The BRE Group Board takes collective responsibility, accountability and authority for all safety, health and environmental matters. The responsibility for safe operation extends from the Board to the newest employee. Including prevention of work-related injury and ill-health with safe, healthy and environmentally friendly workplaces and activities. The BRE Group Board delegates day-to-day responsibility for meeting these standards to local management, i.e.:

- *Senior Executives, Divisional Executives.*
- *Exec Director responsible for Safety, Health & Environment*
- *Service and Business Area Managers.*
- *Head of SHE*
- *SHE Manager*
- *The person in charge of any group of employees has direct responsibility for their health and wellbeing.*
- *Persons appointed to support the SHE Manager in regards environmental protection.*

Where necessary, the Head of SHE and SHE Manager may consult specialists and professionals, to advise on installation, maintenance and use of plant and materials. BRE encourages an awareness of health and wellbeing, and environmental concerns amongst their employees and management at all levels setting an example in safe behaviour. Collectively all are responsible and accountable for the safety, health and environmental concerns within their remit. Personnel need to be aware the law prescribes specific duties to all persons depending on their level of responsibility.

1.2 Policy and Procedures

We have developed procedures and guidance to help deliver our safety, health and environmental policy and we expect all staff to use and follow them. These documents can be found on the company Intranet/SharePoint systems via the Group Management System. The development of the SHE policy is a continuing process and the BRE Group will facilitate this development by regularly inspecting all BRE Group procedures, functions and facilities, consulting with and considering suggestions from employees on such matters, reviewing and amending the policy as necessary. This will incorporate fire safety management to ensure the protection of wellbeing, company assets and business opportunities.



1.3 Training

The BRE Group provides information, instruction, training and supervision to ensure the health and wellbeing of its employees by:

- Appointing a SHE team to provide information, advice and assistance on matters of health and wellbeing.
- Providing appropriate instruction and job training to all persons, also where jobs involve potential hazards to the health or wellbeing of employees, to bring the hazards to the attention of the employee and give advice as is necessary to minimise the risks.
- Fostering a high standard of safety awareness among its employees, sub-contractors and anyone associated with the BRE Group undertaking.
- Providing information on what training is mandatory to staff, depending on their work practices and set refresher periods for the training.
- Providing a database for the company and the individual to record both internal and external training.
- Operating Personal Development Reviews to monitor training, licences and competency of employees.
- Delivery of an online learning management system to complete mandatory training within the business, which includes health and safety, and environmental awareness training.

1.4 Communication & Involvement

The BRE Group regularly communicates, consults and participates with staff on matters of safety, health and environmental concern in a variety of ways including briefings, centre meetings, newsletters, posters, training, intranet information and personal contact, along with formal minutes of health and wellbeing meetings. BRE promotes open two-way communication and discussion to seek continuous improvement in standards of health and wellbeing.

1.5 The Working Environment

Maintaining the place of work in a safe condition and with regard to environmental management is achieved by:

- Complying with all statutory requirements regarding lighting, heating, ventilation and noise.
- Maintaining the buildings, other structures, fabric and services.
- Making regular inspections to ensure that any potential risks to health or wellbeing are addressed.
- Keeping all machines and equipment safe, without risks to health and wellbeing.
- Keep fire exits/routes clearly marked, free of obstacles and providing sufficient firefighting equipment.
- Training staff of the procedures used in the event of fire and other emergencies.
- Providing adequate washing and toilet facilities (welfare), particularly paying close attention to this during CDM activities and other such operations.
- Providing adequately trained First Aiders, first aid equipment and materials.
- Providing suitably competent Building Wardens to complete a monthly building/ area walk/inspection.
- Topical training modules undertaken to address key issues and hazards.
- Waste management and other such processes in place.
- Several forums available where SHE concerns can be raised and addressed including the Colleague Forum.

1.6 Auditing & Inspection

The BRE Group regularly audits facilities, offices and working practices. In addition, senior managers regularly undertake informal inspections. These activities verify compliance with BRE policy and procedures; reinforce messages on safety, health and environmental concerns, encourage feedback to aid continuous improvement.

1.7 Safety, Health & Environmental Group

A meeting, under the chair of the BRE Exec Director responsible for SHE (Director of Innovation), provides an independent check that management and staff carry out their health and wellbeing duties satisfactorily and standards are continuously improved. Other forums such as the Health & Safety Group also cover HS&E concerns with the Director of Innovation and SHE Manager.



1.8 Legislative & Other Compliance

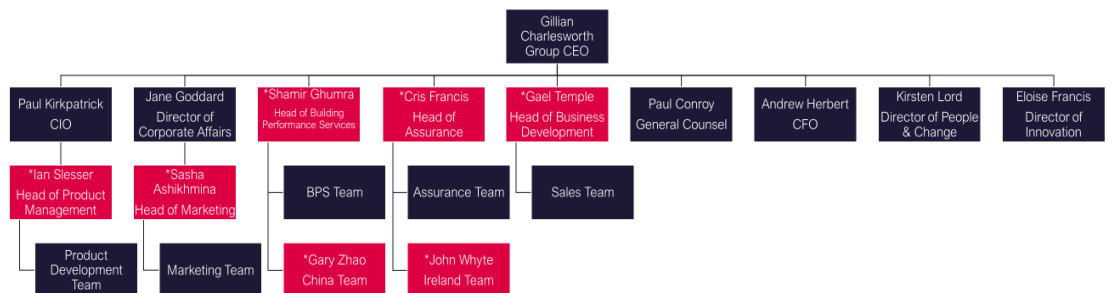
A register of applicable legislation, industry, other relevant guidance and stakeholder requirements is held on the intranet, identifying the why and how these documents apply to BRE and how BRE maintains compliance. The register is reviewed annually to confirm any alteration, incremental implementation, or changes to applicable documents. (This includes any deregulation or reforms.) In ongoing fashion, the Estates team reviews the statutory compliance of the company, setting actions and improvements to maintain compliance on a tracker

2. Roles & Responsibilities

2.1 Lines of Responsibility and Reporting (Health and Safety Management)



Interim Executive Team Structure October 2022



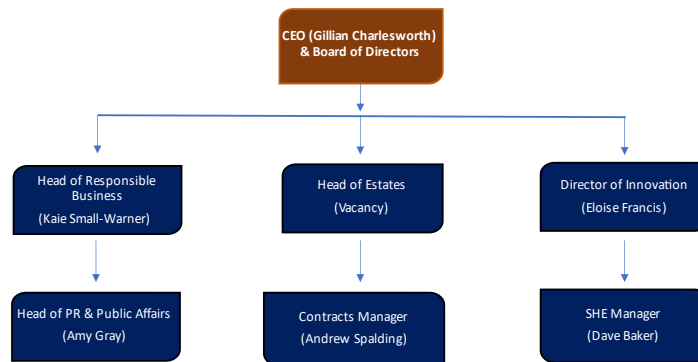
*temporary change of reporting line



2.2 Lines of Responsibility and Reporting (Environmental Management)

ENVIRONMENTAL MANAGEMENT REPORTING LINES

OCTOBER 2022



3. Roles, responsibilities, accountability & authorities for managing health & wellbeing

The CEO has overall authority and responsibility for safety, health and environmental management of the BRE Group, on behalf of the Group Board, including safe systems of work for all employees, clients, visitors and sub-contractors on BRE sites or working in BRE's undertaking.

The CEO is advised by the Exec Director responsible for SHE (Director of Innovation) and their team. Each individual employee, client and visitor to the site is accountable for the responsibility of their own health, safety and wellbeing as well as that of their colleagues, where they can have influence. Specific responsibilities are defined within individual's job specifications or project/task specification. A manual has been produced for the Environmental Management System.

3.1 The BRE Group Board:

- Has authority to agree and review the BRE Group Safety, Health and Environment (SHE) Policy statement.
- Promote continual improvement of the safety, health and environmental protection culture.
- Manage and are responsible for BRE Group's companies, corporate decisions being in accordance with the safety, health and environmental management systems and policies.
- Will take on the leading role for business continuity
- Shall be the face of safety, health and environmental concerns both corporately and publicly
- Shall be accountable for the above.



Title: Health, Safety & Environmental Management

Date: 18 October 2022

Document No: XA10

Revision: 2.0

3.2 Senior and Divisional Executives

The Senior and Divisional Executives are accountable to the Group Board for the health and wellbeing of all within their area of responsibility and they:

- Adhere to The BRE Group safety, health and environmental policy.
- Have authority to appoint executives, directors, service and business area managers, as appropriate and confirm their roles, responsibilities, accountabilities and authorities.
- Implement, promote and monitor health and wellbeing procedures across the BRE.
- Keep records of all safety inspections and maintain company registers.
- Are responsible for having resources available within the team to meet regulatory/other requirements, the provision of all equipment, information, instruction/training necessary to ensure wellbeing.
- Use the central Group Management system to review and store health and wellbeing documentation.
- Have health and wellbeing as a topic in all BRE meetings.
- Liaise with the SHE Team and Estates Team as necessary on related matters.
- Make regular inspections of their team's offices, laboratories, test facilities and working procedures to ensure compliance with safety, health and environmental requirements.
- Have risk assessments on every project file and the central database. Where a method statement is indicated by a risk assessment this must also be included.
- Report all health and wellbeing events (including near misses)
- Create and maintain business continuity plans for their area of business.

3.3 Service and Business Area Managers

Service and business area managers are accountable to the Group Board for the health and wellbeing of all within their area of responsibility and they:

- Adhere to The BRE Group safety, health and environmental policy.
- Make their line managers and teams aware of their responsibilities, accountabilities and authorities.
- Implement, promote and monitor health, wellbeing and environmental procedures in their service or business activity.
- Are responsible for having resources available within their area of BRE to meet all regulatory and other requirements, the provision of all equipment, information, instruction and training necessary to ensure health and wellbeing.
- Use the central Group Management System to review and store properly, safety, health and environmental management documentation.
- Attend relevant meetings that address safety, health and environmental concerns.
- Liaise with the SHE Team as necessary on safety, health and environmental matters.
- Make regular inspections of the service or business area activities/procedures in offices, laboratories and test facilities, for compliance with the BRE Group safety, health and environmental requirements.
- Report all safety, health and environmental events (including near misses).
- Are responsible for employing contractors in accordance with the BRE Group's Approved Contractor procedure, supplying appropriate documentation to demonstrate their competency, along with good health and wellbeing standards.
- Are accountable for BRE Group staff, contractors and tenants adhering to the Group's site Health and Wellbeing Policy.
- Must complete the Managers Pack at the appropriate time twice a year.
- Provide continuity of services to compliment departments Business Continuity plans.

3.4 BRE Safety, Health and Environmental Manager:

- Assists in promotion and development of key performance indicators to ensure the health and safety of the employees, clients, visitors, contractors or sub-contractors.
- Acts as a co-ordinator and adviser to the BRE Group Board.
- Has authority to monitor implementation of the Company Safety Policy.
- Is responsible for providing a framework for health and safety, and environmental management to eliminate gaps in responsibilities or arrangements for health and wellbeing
- Reports directly to the Executive Director responsible for SHE (Director of Innovation).
- Liaises with relevant external authoritative bodies.



Title: Health, Safety & Environmental Management

Date: 18 October 2022

Document No: XA10

Revision: 2.0

- Informs Senior figures and service and business area managers about any relevant changes in safety, health and environmental legislation in a timely manner.
- Receive and distribute information from Inspectors of the enforcing authority.
- Stop any work considered to give rise to imminent danger.
- Arrange audits of compliance with BRE Group's Safety, health and environmental policies, arrangements and management.
- Investigate accidents and incidents, when necessary notifying the Health and Safety Executive.
- Act as Site Incident Manager to assist with the operation of the site business continuity plans.
- Act as a competent person to control sources of radiation and ensure regulatory compliance.
- Confirm fire safety inspection forms for each building are completed monthly and that any remedial action is taken as soon as reasonably practicable.
- Co-ordinate risk assessment analysis including any opportunities identified during assessments. Also ensure the ideals of risk assessment are clear and identified during mandatory training.
- Undertakes and keeps fire risk assessments for all buildings on file and makes them available to occupants.
- Liaises with laboratory managers and tenants' representatives to ensure the integrity of the fire safety for buildings is maintained in restricted areas.
- Exchange relevant information about fire risk assessments with tenants for suitable and sufficient management of fire safety for all building occupants.
- Collate and maintain a 'Grab Folder' for each building on site, holding information for the Emergency Services on utility supplies, hazardous storage and current floor plans.
- In the event of fire or another major incident, confirm that 3333, the emergency number of the BRE Group Watford site has been dialled (01923 664333 from a mobile).
- Receive "Sweeper Disc" reports and responsible for notifying the Fire Brigade or the "Incident Controller" of any remaining occupant's location in a building, in the event of a fire alarm.
- Co-ordinate fire drills/report any shortcomings in fire safety provisions to the HS&E Team.

3.5 Group Safety Committee

The BRE Group Safety Committee meets annually. The minutes of the BRE Group Safety Committee are sent to all its members and posted on BRE Intranet along with the annual report.

The BRE Group Safety Committee:

- Receives reports from staff, the Head of SHE, external/internal assessors and safety representatives.
- Reviews Health and Safety performance annually.
- Sets the site safety goals/objectives/targets.

The outcomes/actions of the Group Safety Committee are completed by the 'Working Safety Group' sub-committee, comprising:

- A BRE Group Director (chair)
- BRE Exec Director responsible for SHE (Director of Innovation)
- BRE Safety, Health and Environmental Manager
- Representatives of group companies and service groups
- Representative of the Trades Union
- Representatives of work areas
- Specialist advisors related to topic under discussion.

3.6 Site-Wide Health and Safety Group

- The group hold meetings monthly
- The group act as mediators directly between the staff and the senior management group members. (This enables feedback to the Working Safety Group and Company Boards).
- There are terms of reference for the operation of this group.
- The meeting operates in two sections, all staff to review site wide issues and a laboratory only section for more focused topics.



Title: Health, Safety & Environmental Management

Date: 18 October 2022

Document No: XA10

Revision: 2.0

3.7 Trade Union Appointed Representatives & Staff Representatives

The appointed representatives:

- Receives reports from any employee with regard to concerns for their health and wellbeing.
- Are accountable for satisfying themselves that the normal line management and BRE Head of SHE have been fully informed of the concerns and have been given reasonable opportunity to address those concerns.
- Make a direct approach to the Health and Safety Executive (in the event of no effective action being taken to suitably and sufficiently protect the health, safety or welfare of the employee).
- Have authority to represent employees (after an accident, dangerous occurrence or other incident leading to interviews with officers of enforcement authority).
- Receive copies of all official communications received from any enforcement authority with regard to action required to be taken by the BRE Group to comply with safety, health and environmental regulations or approved codes of practice.
- Has access to any reports and can inspect any statutory record held within the BRE Group.

Their duties also include:

- Representing employees in consultation with management.
- Responsibility for making verbal/written health/wellbeing reports to management.
- Carrying out formal inspections of the workplace where reasonable notice is given to the BRE Group.

3.8 The Estates Team

The Estates Team general duties include:

- That building work and alterations comply with statutory obligations under health and safety legislation.
- Managing contractors providing site maintenance, security and cleaning.
- Maintenance of premises, major plant and equipment, ladders, scaffolding, portable scaffold towers and mobile elevated work platforms; elevators; lifting equipment and installed pressure systems.
- Maintenance of Estates owned or leased vehicles.
- Organisation and management of 'emergency response' in conjunction with BRE Estates Team, acting as part of the Emergency Plan and Incident Response.
- Supply and maintenance of signage and road markings.
- Maintenance of walkways, paths and roads (snow clearing, gritting/salting pavements and roads).
- Providing adequate fire safety equipment (including its inspection and maintenance).
- Liaising with laboratory managers in planning alterations that affect laboratory facilities.
- Management of all water systems, to effectively control the risks from water borne pathogenic organisms, also suitable discharge via drainage and surface water including run-off.
- Management of all safety, health and environmental concerns within their skillsets.

3.9 Specific Hazard Safety Advisers

Where specific hazards have been identified (e.g., radiation, fire, asbestos, a specialist safety advisor will be appointed to advise on the risks from that hazard. Such appointments may be internal or external).

The Specific Hazard Advisor:

- Supports the BRE SHE Team in their areas of expertise.
- Advises on the implementation/enforcement Standard Operating Procedures and local rules

3.10 Laboratory Managers

Laboratory managers:

- Co-ordinate and schedule all activities within their laboratory.
- Ensure all relevant safety paperwork (Risk Assessments/Method Statements and insurances) for BRE Group personnel and contractors are in place for any activity being undertaken in the laboratory.
- Keep the laboratory secure.
- Maintain a clutter free environment in the laboratory.
- Correctly store chemicals and keep records for material purchased.
- Check that safety signage is maintained to current requirements.
- Arrange provision of the personal protective equipment required free of charge.



Title: Health, Safety & Environmental Management

Date: 18 October 2022

Document No: XA10

Revision: 2.0

- Keep fire exits in good working order and clear of obstructions.
- Confirm fire extinguishers are of a type suitable for the fire risks in the laboratory, are in their correct location and maintained in good order.
- Keep safety equipment (e.g., safety showers, eye wash stations, first aid equipment and telephones) clearly marked, accessible and maintained in good order.
- Have access routes clear and marked, reporting any problems with the fabric of the laboratory (e.g., lights, leaks, environmental problems) to the Estates Group.
- Regularly inspect for hazards and unsafe conditions and take action to minimise any risks identified (e.g., trip, slip and body contact hazards).
- Liaise with the Estates Team and any other contractors who may need to have access to the laboratory e.g., for maintenance, inspection or repair work.
- Confirm risk assessments are completed and saved in line with procedures then communicate the significant findings, also display safe practices.
- Only allow tools and equipment to be used for the purpose for which they were designed, maintained in good order and only used by competent operatives.
- Support their line managers with compilation and operation of business continuity planning

3.11 Project Managers

This includes anyone who is acting in a supervisory management role on behalf of the BRE Group. Local line management are responsible for:

- Maintaining a safe place of work.
- Risk assessments completed and saved in line with procedures, significant findings communicated.
- Safe use and maintenance, of equipment and substances.
- Safe systems of working.
- Provision of the personal protective equipment required, free of charge.
- Provision for personal protective equipment storage and maintenance.
- Adequate training and supervision.
- Appropriate care of clients, visitors and contractors.
- New staff being trained in, and informed of, safe working practices.
- The implementation of procedures through safety inspections, taking into account the hazards and the associated risks and any changes that have occurred.
- Corrective actions are taken that arise from inspections and assessments.
- Staff complying with BRE Group procedures, guidance and codes of practice.
- Completing the Manager's Pack at the appropriate time twice a year.
- Support their line managers with compilation and operation of business continuity planning

3.12 First Aiders:

A Lead First Aider will be appointed who is responsible for:

- Coordinating First Aid at major incidents.
- Provision of First Aid equipment in conjunction with BRE Head of SHE.

First Aiders are responsible for:

- Maintaining their First Aid bags with up-to- date supplies.
- Being available for emergency situations and notifying of periods of leave.

3.13 Site Security Team

In the event of any emergency the Site Security Team are responsible for:

- Calling the relevant emergency services.
- Informing the Estates Team who will inform BRE Head of SHE.

In the event of an accident involving injury or ill health Security will:

- Ensure adherence to the emergency procedures given effect.
- Have the authority to contact and direct First Aiders to the site of the accident.
- Have authority to contact the Ambulance Service if requested by a first aider.



- Be accountable of informing the Estates Team and/or BRE Head of SHE.

3.14 Building Wardens

A voluntary position where a member of staff helps to maintain their colleague's health and wellbeing by:

- Carrying out monthly inspections of a building or area.
- Using the reporting form to record the inspection or any actions identified including fire risks.
- Acting as the central point of contact between occupants and Estates for repair and maintenance.
- Assisting Fire Safety Co-ordinator by identifying fire related issues via the monthly report or sooner.
- In an emergency ringing the 3333-emergency telephone number.

3.15 All Employees

All employees will:

- Carry out all operations and work in accordance with the BRE Group Management System and any local procedures or work instructions.
- Have responsibility to use all equipment safely and in accordance with instructions and training, including safety equipment and clothing provided to them.
- Have authority to report any defects in anything provided for their health and wellbeing or in the workplace immediately to their line manager.
- Work in a safe manner, with awareness and concern for the wellbeing of themselves and others.
- Be accountable for only using equipment that is suitable for the purpose and in accordance with the manufacturer's instructions, not take short-cuts in operation of equipment or working practices.
- Set a good personal example, especially to newer members of the organisation.
- Report any accident, incident, or near miss promptly, also record accidents in a BRE Group Accident Books and inform the BRE Head of SHE
- Co-operate in the investigation of accidents and incidents with the objective of appropriate action being taken to prevent recurrence, without fear of reprisal.
- Suggest ways of improving health and wellbeing, reducing risk and identifying.
- Inform their line manager of pre-existing or developing medical conditions which may affect the health and wellbeing of themselves or other workers as soon as they become aware of it (including pregnancy).
- Remember their duty of care when working away from their normal workplace (e.g, working on clients' or suppliers' premises) and that all the relevant policies and procedures are known, understood and followed.
- Work 'off site' in accordance with BRE health and wellbeing rules and those of the site owner/occupier and to complete their own risk assessment/ method statement for their work.
- Be accountable for complying with BRE Group procedures, guidance and codes of practice.
- Be responsible for their visitors and for informing them of relevant health and wellbeing procedures.
- Work with the management chain to carry out the requirements of the department business continuity plans.

3.16 Occupational Health

Occupational Health is concerned with the interface between work and wellbeing (how work/working environments affect health and how health can affect the ability to work). Occupational Health will deliver a service that provides BRE with advice, guidance and support relating to work and wellbeing and assist with lifestyle choices by:

- Working in partnership with BRE's Human Resources and Estates Team to develop and implement appropriate procedures and associated arrangements.
- Advising on work related illness and accidents.
- Carrying out medicals for new starters and existing staff
- Reviewing suitability of job applicants for the role.
- Helping BRE manage workplace absence.
- Liaising with GPs and Consultants.
- Supporting phased return to work programmes.
- Providing Health Surveillance services/tests for employees in specialist job roles.
- Provision of counselling services related to stress and mental wellbeing.
- Information on health promotion activities (e.g., lifestyle, fitness and diet).



4. Disabled Persons

4.1 BRE Group Staff

Any member of BRE Group staff with a disability is assessed to determine any adaptations or modifications required to their working environment. This assessment will take due account of emergency precautions. Temporary disabilities will be treated in a similar way. Managers are responsible for the completion of Personal Emergency Evacuation Plans (PEEPs) for anyone who may be in these situations.

4.2 Visitors

BRE Group operations and activities are managed to eliminate or reduce to a minimum, the risks to the health and wellbeing of our visitors, clients and contractors. To this aim we will make all reasonable arrangements to our premises to be accessible to all without restriction. This applies to normal and emergency operations of the activities, buildings and grounds

5. Related Documents

For all other documentation and guidance please refer to the BRE Safety, Health & Environment (SHE) Portal. [Safety, health and environment \(sharepoint.com\)](https://sharepoint.com)

6. Arrangements For Management of HS&E Hazard Areas:

The arrangements section of the policy is the 3rd statutory element of the policy that deals with the over-arching systems given effect to manage safety, health and environmental concerns in a proportionate, compliant and common-sense manner, with the current circumstances in mind. The systems are also designed to produce enough evidence for audit and so whilst there is paperwork generated by the systems, a balance has been struck between that necessary to comply with ISO and UKAS standards (which enable the business to operate) and avoiding 'red tape' wherever possible. Please note, the systems described do not detail controls in as detailed a manner as risk assessments do.

Access & Egress

Safe access and egress to, from and around site (including emergency access and egress) is required under Section 2 of the Health and Safety at Work, Etc, Act 1974. It is critical that all elements of access and egress are managed, including:

To Campus Site

- *Temperature checks using thermal scan guns are undertaken at the manned, gated entrance, which acts as a barrier for maintaining a 'Covid-free' environment.*
- *Appropriate levels of information, instruction, training and supervision.*
- *ID Cards, and Staff Passes have been given effect.*
- *Staff attendance monitored to minimise risk of Covid-19 transmission*
- *Visitors/contractors (etc) to report to reception (or otherwise B14, 3rd Floor) to sign in/out via the Envoy programme. Envoy keeps records which can be accessed for audit or to confirm site attendance.*
- *Warning signs to be erected to warn of hazards, appropriate controls given effect at the gate, and any other relevant information.*

Around Buildings

- *Secured locks to prevent unauthorised access.*
- *Key code registers kept with key personnel*
- *Due diligence for building population*



Title: Health, Safety & Environmental Management

Date: 18 October 2022

Document No: XA10

Revision: 2.0

- Visitor/contractors to be fully inducted by BRE via the Estates team where prudent to do so.
- Warning signs to be erected to warn of hazards, works in progress and any relevant contact details.

Construction Sites

- Means for securing work areas arranged ahead of time and arrangements documented
- Suitable access and egress, including lit areas where required (particularly after 3pm in winter, and for out-of-hours work)
- Appropriate site management and monitoring from project managers and other such parties.
- Only approved, competent persons to enter these work areas.
- Warning signs to be erected to warn of hazards, work in progress and relevant contact details.
- Where hoarding is erected, lighting should be present to illuminate access/egress portals as well as the hoarding itself.

Emergency Access/Egress

- Emergency exits examined daily as part of routine due diligence.
- Reporting procedures in place for anything that is substandard.
- Appropriate signage to be erected.
- Condition surveys of all access and egress portals carried out periodically

Access Equipment/Platforms

Work at height, including work on access platforms, contributes heavily to the number of injuries and fatalities at work each year. As such, the following systems are in place to ensure, so far as is possible, the wellbeing of all involved in this type of work:

- Risk assessment, method statement and permit-to-work to identify the best piece of access equipment for the job, along with relevant PPE/RPE and safe working practices.
- Only approved, competent persons to use access equipment/platforms.
- Pre-operation inspections and documented records of fitness for purpose by competent persons.
- Permit to work required for work at height operations including use of access platforms.
- No work in high winds or other adverse weather conditions.
- Supervisors authorised to stop work if there is a risk of access platforms/equipment toppling or otherwise being adversely affected, or if likelihood of harm increases by a reasonable margin.
- All access equipment/platforms to be risk assessed prior to works being undertaken.
- Survey of the working environment to be undertaken before citing access platforms/equipment.
- Copies of relevant training/upskilling cards, certificates, etc to be provided and kept on record.

Accidents, Reporting & Investigation

The purpose of undertaking of accident investigation is to prevent the accident happening again. As such, it is essential that accident, incident, near-miss, dangerous occurrence and ill-health reporting takes place at all levels of the business. It is also essential that such events are not 'dramatised', and that events are correctly reported (i.e. not reporting a broken door lock as a near miss, rather than the maintenance issue it is).

Accident, incident, near-miss, dangerous occurrence and ill-health reporting:

- Processes established and communicated to all persons.
- Encourage reporting among staff at all levels, reinforced with guidance to avoid the reporting of non-near misses (e.g., cars finding potholes).
- RIDDOR reportable events to be reported by a member of Senior Management or Estates only.
- If staff/others report a concern which is found to be without merit, that person/persons shall be protected from consequences if they genuinely believe the concern was legitimate.

Accident, incident, near-miss and ill-health investigations

- Processes established and communicated to those authorised to investigate.
- Only competent, trained persons to be authorised to investigate.
- Findings to be published for Senior Management and Health & Safety Group/Committee
- Findings to be kept on file and kept available for the HSE and other enforcement authorities who may request these, along with any other materials from investigations.
- Authorised persons may follow evidence wherever investigations lead, without Senior Management interference with any investigation, to ensure objectivity and transparency.
- Resources will be made available to investigators to ensure they can follow evidence to its logical conclusion.



- *Review process for reports established, with feedback mechanisms in place.*

Adverse Weather

Adverse weather presents many hazardous situations on the road and in everyday operations, therefore, BRE expect staff to ensure that appropriate measures are taken to deal with hot or cold adverse weather.

- *Work from home procedures will minimise adverse weather impact.*
- *Due to work from home protocol, staff are encouraged to contact BRE to get assistance with weather-related issues.*
- *Appropriate weatherproofed clothing/PPE/footwear to be supplied at zero cost to staff where required.*
- *All works likely to have to take place in adverse weather shall be subject to a risk assessment, and, at the discretion of Estates, may also require a full SSW (method statement/permit-to-work)*
- *Works with a likely high degree of exposure shall be dynamically assessed at the point of work, as well as monitoring weather conditions.*
- *Work on rooftops not permitted at all during adverse weather without lightning and edge protection in place, or otherwise a man-safe system of some description.*
- *Information, instruction, training and supervision provided where required.*
- *No lone working in adverse weather conditions, except where additional controls may be suitably used and risk is identified as reasonably low.*
- *If driving in adverse weather, drive to the conditions, plan your journey and only travel if absolutely necessary. Driver discretion is recommended, to avoid feeling pressured into driving in dangerous conditions.*
- *If driving, take all necessary precautions to offset problems caused by adverse weather, including measures to deal with the possibility of being stranded (blankets, high visibility markers and clothing, hot drinks in flasks, fully charged mobile phone).*
- *Ensure that hot adverse weather conditions are offset by covering the skin in light-coloured clothing which doesn't trap heat, and clothing that allows the skin to breathe as much as possible, especially when outside or in buildings that are naturally warm.*
- *Ensure appropriate means of hydration is available to you and that breaks from extremes of heat or cold temperatures are undertaken regularly.*
- *Consult HSE pamphlet INDG337 for further guidance and information.*

Alcohol and Drug Abuse

- Information provided including in the form of awareness campaigns
- Confidential advice and addiction assistance hotlines publicised
- BRE seeks to balance disciplinary elements and assistance and support to rehabilitate
- Potential for suspension from duty, pending investigation, where staff are found to be under the influence.
- Access to counselling, and occupational health services

Animal Attack

Whilst rare, some animals that bite or sting can cause allergic reactions and anaphylaxis, among other medical problems. As such, the following expectations are to be met:

- *Periodic survey of the site in regards identifiable insect, vermin and other such vermin.*
- *Availability of injections and those trained to use them for specific allergy treatment.*
- *Those who know they are allergic to bites or stings from certain animals/insects, etc, must make this known to HR and health and safety as soon as possible.*
- *Emergency procedures created and communicated, including procedures for summoning emergency services.*
- *Field Biohazard pack produced***
- *First aiders on site.*
- *Onus on staff to make known any allergies (Bee/Wasp stings, etc)*



Asbestos

Ill-health related to asbestos exposure kills some 5,000 people a year, and this particular hazard is a proven long-term killer. As such, BRE are doing everything in their power to manage the risks posed by asbestos, and have given effect to the following arrangements:

- *Asbestos management plans, containing building by building surveys kept up to date*
- *Engaged an experienced contractor to monitor and advise as to condition of materials and pertinent actions under Regulation 4.*
- *Competent contractor appointed to advise and undertake inspections of asbestos containing materials periodically, most recently done in October 2020.*
- *Re-inspections undertaken 2-yearly.*
- *Asbestos awareness training provided through the online LMS.*
- *Reports and records retained as per statutory obligations.*
- *Guidance literature available on the shared drive.*
- *Open-door invitation to report suspected asbestos throughout chain of command.*
- *Appropriate PPE/RPE to be provided if working around any suspected asbestos.*
- *Where asbestos may be removed from buildings, full adherence to legislation, codes of practice, guidance and relevant policies will be observed by specialists.*
- *Warning signs to be erected to warn of hazards and any works in progress.*
- *Complete restriction of access to areas where asbestos-related works (except surveys/re-inspections) are taking place.*
- *Asbestos 'a' stickers cover sampled areas in ACMs and suspected ACMs throughout the site.*

Audit, Monitoring, Measurement & Inspection

Performance measurement through audit, monitor, measurement and inspection is critical to understanding where performance issues lie within the business. Such mechanisms allow the business to assess trends and attitudes, compliance and potential breaches, and understand the actions needed to fix breaches as well as identifying opportunities for improvement. This pro-actively provides a means to pursue safety, health and environmental excellence by means of:

- *Defining remits for QSHE audits, inspections, monitoring and measurement.*
- *Establishing a regime to undertake all statutory and good practice audits, inspections, monitoring and measurement*
- *Establishing an internal audit regime implemented and used to close out all NCs identified prior to external auditing is undertaken.*
- *Ensuring only competent persons to undertake audits, inspections, monitoring and measurement.*
- *Making sure non-conformity closure processes are suitably established so as to ensure that continuous improvement is achieved.*
- *Publication of audit information to Health & Safety Group, S-Plan, and other relevant groups for review and feedback.*

Building Services

Problematic services can result in a huge risk to life, particularly where they involve hazardous energy (gas, electricity, etc). As such, BRE ensure that we maintain building services to ensure that risk is mitigated so much as is possible, by means of:

- *Having specialist contractors maintain services, who undertake remedial work where necessary under strict conditions, including the submission of RAMS and other control measures where appropriate.*
- *Insurance inspections undertaken to identify necessary remedial works.*
- *Ensuring only competent, trained persons are permitted to work on site services.*
- *Notice is to be given in advance (except in the case of emergency works), providing those who may be affected with suitable notice for the works to be completed and arrangements to be made by tenants/BRE staff to work around necessary works.*
- *Warning signs to be erected to warn of hazards and works in progress.*
- *NICEIC and Gas Safe certificates and other necessary certification is retained on file to create a suitable audit trail and demonstrate compliance.*

CDM2015

All projects with a construction element are governed by the Construction (Design and Management) Regulations. These regulations place specific duties on 'duty holders' including Clients, Principal Contractors, Contractors, Principal Designers, Designers, and Workers. In order to ensure that BRE is meeting its statutory obligations, the following controls have been given effect:



Title: Health, Safety & Environmental Management

Date: 18 October 2022

Document No: XA10

Revision: 2.0

- *Employment of expert project managers oversee CDM projects on site*
- *Detailed communication with IPs in regard to any projects being undertaken.*
- *Adequate pre-qualification vetting is in place to select designers, contractors and consultants.*
- *CDM2015 is fully complied with as a matter of course, with particular reference to enforcing Part 4 commentary within construction phase plans.*
- *Pre-construction information complied and distributed to competing contractors*
- *Full advisory review of construction phase plans undertaken.*
- *Health and Safety Files are maintained to ensure end user safety.*
- *Feasibility and risk management process as part of the pre-construction phase*
- *Channels established within each project for the sharing and understanding of information, reinforced with suitable communication channels.*

Clear Desk Policy

From August 2020, those working on site will need to ensure their desks are clear of unnecessary paperwork and items and regularly cleaned, so as to limit the spread of Coronavirus and other pathogens/contaminants.

- *This is a control implemented in the Covid-19 risk assessment and stop the spread strategy.*
- *The policy is enforced by line managers, and those above this position in the chain of command and shall also be enforced by Estates compliance and health and safety audits/inspections.*
- *It is to be ensured that desks are cleared of all items except IT equipment.*

Communication

Communication is critical to managing safety, health and environmental practices and expectations, and making sure all parties have received comprehensive, comprehensible information, instruction, training and communication.

- *Internal and external communication processes established and communicated.*
- *Scheme of what information can be transmitted outside the organisation established and communicated.*
- *Specified channels are available for engaging in safety, health and environmental concerns, sharing of information, and undertaking regular inter-departmental meetings, with information cascaded and communicated in a varied number of ways (specify ways)*

Consultation With Employees/Employee Representatives

The organisation seeks to ensure that all parties who may be impacted by a change within the organisation are duly notified and prepared for changes. As such, consultation shall take place with employees and employee representatives, including union representatives and the various health, safety and environment-led groups that are present within the organisation for the purposes of acquiring suitable feedback and asking pertinent questions, with the expressed purposes of:

- *Securing accurate and relevant information as it impacts each individual within the site and outside of the site to whom a relevant duty of care is owed.*
- *Ensuring that all viewpoints are represented and that every member of staff and other relevant persons are able to express themselves and have their perspective heard.*
- *To head-off hearsay and rumours, and present facts and findings.*
- *To represent the company position on changes and the benefits they will bring (a) to those working with/for BRE, and (b) to the business itself.*
- *To demonstrate a commitment to the duty of care owed to all under relevant statutory provisions.*
- *To enable all staff and others to carry out their duty without any adverse risk to their health, safety and general wellbeing*

It is vital, in the eyes of the organisation, that everyone has access to the correct information and that this is readily available in a comprehensible and comprehensive format, and that it is reinforced with suitable open-door policies, access to specialists within the organisation for comment, and provides demonstrable assurance that no employee or other shall have anything to fear from the changes, or from voicing their opinion or opposition to said changes.

Competence/Training

It is a legal requirement to provide relevant information, instruction, training and supervision to those who require such inputs to undertake their work safely and effectively. This may include upskilling and mentoring, or formal training at the discretion of Senior Management. As such, BRE endeavour to:

- *Only recruit the best available competent persons for the business.*



- *Provide appropriate information, instruction, training and supervision are provided, along with a suitable management structure to manage persons and practices.*
- *Ensure upskilling and mentoring programmes are running in specific parts of the business and will continue to be developed and extended to cover the whole business.*
- *Ensure all persons on site have the requisite qualifications, skills, knowledge base and experience to fulfil their roles.*
- *The company has purchased a new online learning management system which will supply mandatory courses for HS&E purposes, and a large number of other courses that will be made mandatory where they apply to specific job roles (e.g., DSE if you use a workstation, Radiation Awareness if you work with radiation).*
- *The new online learning management system will produce reports regularly to show who has undertaken their mandatory training and who is required to still complete it.*
- *Escalation reports will be maintained to ensure compliance with undertaking mandatory training, with line and departmental management utilised to ensure this, as they will be made accountable for any failures to complete the training.*
- *There will be a name-and-shame for those departments failing to complete mandatory HSE training.*
- *Requests can be made through the management structure for extra necessary training.*
- *Due diligence performed to verify qualifications upon offer of employment.*

Confined Spaces

Confined spaces are potentially lethal, and it is an area of health and safety management that requires a high level of competence. As such, BRE undertake to ensure the management of safety regarding this high-risk activity by giving effect to the following:

- *Confined spaces training/confined spaces entry training. undertaken under direction of a competent person.*
- *Rescue plans and rescue teams to be present where appropriate.*
- *Full compliance with the requirements of the Confined Spaces Regulations 1997, along with associated ACoPs, Guidance and other advice.*
- *Acquisition of relevant PPE, breathing apparatus and other equipment that is required, including intrinsically safe tools.*
- *Ensuring that a competent 'top man' is always available.*
- *All activities suitably and sufficiently risk assessed and undertaken under the authority of a method statement and permit to work, regardless the duration spent in a confined space or its size.*
- *Register of confined spaces on site created.*
- *Provision of appropriate levels of information, instruction, training, and supervision.*
- *Segregation, and warning signs to be erected to warn of hazards and works in progress.*

Continuous Improvement

All of the standards we work to, with particular reference to ISO and UKAS, require the organisation to show continual, incremental, consistent improvements in safety, health and environmental performance. This means that objectives and targets are set, and particular KPIs used to demonstrate practically how close to hitting performance targets the organisation is. Additionally:

- *Internal and external audits are undertaken by competent persons to monitor the organisation for improvements, lapses and non-conformities in the business management systems (OH&SMS, EMS)*
- *Estates undertake general site/compliance audits to ensure standards are upheld against a baseline.*
- *S-Plan have been adopted into the framework for setting management system objectives for the EMS. This shall improve our ability to monitor and report on environmental performance in a meaningful way.*
- *Estates and Health and Safety have been combined to make monitoring and improvement of business performance easier and improve the ability to monitor/report on health and safety performance in a meaningful way.*
- *The quality management system is routinely examined to enable streamlining of the management systems to reduce bureaucracy where it is identified, whilst also giving a base-line audit trail to keep records and manage all facets of the business where records need to be kept.*
- *It is the longer-term goal of the organisation to integrate the systems to reduce paperwork, streamline systems and ensure monitoring and reporting are less time consuming and more purposeful for the strategic direction of the organisation.*



- BRE acknowledge the need for a buy-in to the continuous improvement mechanisms through being the change they wish to see on site and making the day-to-day operations they engage in the foundation of an excellent management system.
- Competent persons are managing the system, and they are regularly engaged in continuous professional development and broadening their knowledge base, skills and experience to ensure this.

Control of Contractors

BRE engage with many dozens of contractors undertaking a diverse portfolio of works, and given the diverse, and sometimes dangerous, activities that taken place routinely on site, it is sensible to generate a solid group of controls to manage contractor safety on site. To this end:

- All contractors are sourced through specialist PQQs and procurement mechanisms
- A full safe system of work has been produced to control contractors through established processes
- On projects, contractors will detail how they will manage risk to all site users through RAMS, construction phase plans, and other written/established means.
- Where contractors are working in unsafe ways, BRE expect site users to report this to Estates, so that this can be authoritatively corrected.
- Induction process implemented and records of induction are kept on the system.
- Contractors are routinely questioned about their work and RAMS prior to being allowed to access the workspace, to ensure that the HS&E facets of their work are not being treated as a 'tick-box' exercise.
- Permits are issued by Estates for specific work types that are inherently dangerous.
- Monitoring of works areas is undertaken by Estates, Project Managers and others randomly to ensure good standards of safety management.
- PPE is worn that reflects the risk involved, as identified in the SSW, and where some PPE types are also required by Covid-19 restrictions, consultation is undertaken to make sure the most suitable PPE is used.
- BRE Staff are expected to challenge anyone on their presence in a particular area if they are not familiar with them.
- Any relevant information, instruction, training and supervision that needs to be provided is provided.
- Access is granted by those experienced with those familiar with the site.
- Work is stopped where it presents a risk to health, safety or general wellbeing, or presents an environmental risk.
- All contractors are temperature checked and questioned about Covid symptoms by security at the front gate prior to entering the site, and familiarised with Covid SoP, and risk assessment.

COSHH, DSEAR & ATEX

Hazardous substances are present around site in some regards, in significant quantities. It is critical to the whole site that hazardous substances are properly managed, to avoid environmental damage, fire and explosion, among other issues where corrosive or toxic substances may cause physical harm or result in longer-term health hazards. As such, the following measures have been given effect:

- COSHH and DSEAR Assessments undertaken for all substances with hazardous characteristics or properties.
- Safety Data Sheets (SDS) are consulted in the creation of the assessments
- Older assessments are archived in accordance with COSHH, along with the accompanying old SDS, providing a detailed archive of knowledge available about the substances historically.
- Only trained, competent persons to be using hazardous substances.
- PPE/RPE to be supplied, along with adequate information, instruction, training and supervision.
- Manufacturer's instructions for use are to be followed fully when using under normal conditions.
- No unauthorised substances to be used on site. If you require the availability of substances, a suitable SSW is to be put in place, and written authorisation given by Estates.
- Access restricted by the use of appropriate storage units.
- Use of drip trays and good storage practices.
- Warning signs erected to warn of hazards where chemicals, solvents and/or similar may be stored, used or disposed of.



Covid-19

Probably the most significant recently introduced risk to health and wellbeing is the Coronavirus (Covid-19), which, to vulnerable persons with underlying health conditions, may be fatal. Whilst for many, symptoms may be mild, and for some, they may be asymptomatic, the potential for the spread of this highly contagious condition is significant. BRE aims to follow current Government guidelines on COVID-19 and will monitor changes to these guidelines accordingly.

Design Work

Design work may come to play a significant part in some operations, however, in context of the CDM Regulations 2015, the following is implemented to ensure designers under CDM2015 are complying with their statutory obligations as duty holders.

- *Only competent designers shall take design work, and only within their competencies and discipline.*
- *All 'designers' shall be answerable to a principal designer where one is required to be appointed.*
- *Design risk management shall be married into concept work from the outset, ensuring that designers risk assessments and risk registers are appropriately maintained throughout the life of project work.*
- *External designers shall be subject to a recognised BRE procurement process and selected from a list of approved suppliers. The approved list shall make, for the avoidance of doubt, no distinction between suppliers, contractors and designers, to ensure that all parties are required to undertake the process.*
- *All adaptations to designs shall be appropriately communicated and recognised prior to works continuing.*
- *Safety, health and environmental matters will be designed into the initial drawings process, and risks designed out as early as possible.*
- *Where works are undertaken at/near a SSSI or similar site, appropriate attention will be paid to any particular design or build restrictions, be it consideration of endangered species or build that may increase a risk to any HS&E aspect of the business.*
- *All designs will be verified by a 2nd opinion where it is necessary to do so.*

DSE & Workstation Use

With the outbreak of Coronavirus, DSE has become a hot topic owing to the need to work at workstations from home. As such, the following controls have been put in place to manage DSE activities at work and at home, to try and ensure, so far as is practicable, that a healthy posture is achieved, along with comfort at the workstation:

- *Compliance with the DSE Regulations achieved.*
- *Work-office and home-office DSE assessments to be held and regularly updated.*
- *Home workers are welcomed to collect any office equipment they may need, including desks/chairs, or otherwise they can be delivered to assist home workers, particularly regarding the Covid-19 outbreak which has caused the organisation to mandate home working wherever possible.*
- *Ongoing communication will be available to all who need assistance and follow-up in regards DSE and workstation set-up.*
- *Advice regarding workstation set-up, lighting levels and other factors influencing home working DSE-related health are available from BRE health and safety staff.*
- *Staff who require reasonable adjustments to workstations will be assisted in this matter.*
- *Optical aids to be paid for and supplied where necessary for DSE users.*
- *Guidance literature is made available on shared drives.*

Driving For Work

Anybody who drives as part of their work is exposed to several additional dangers and not all of them are reasonably foreseeable. As such, we have opted to train, and put in place procedures to ensure that drivers, particularly those driving in winter or other adverse conditions, are as protected as can be achieved in the circumstances. To this end, BRE have implemented the following arrangements to ensure driving for work is a practice that is properly managed:

- *BRE vehicles are subject to visual pre-op inspection and a monthly formal check for the purpose of due diligence record keeping.*
- *Those driving for work are supplied with a travelling first aid kit and burns kit.*
- *BRE operates a zero-tolerance approach to drugs and alcohol during working hours, and at all times, drivers are to be free of the influence of drugs or alcohol.*
- *Random drug and alcohol tests may be undertaken with no notice, for anyone taking a work-related journey*



- *Drivers are instructed to rest when they begin to feel fatigued at the wheel, plan journeys and ensure suitable rest breaks. BRE do not want drivers falling asleep at the wheel. No more than 2 hours journey time without a break, however, if a break is needed, this comes at the discretion of the driver.*
- *If driving a significant distance (100+ miles or 2+ hours), drivers should speak to their line manager about the potential for overnight stays*
- *If driving overseas, only those who are familiar with the local road laws may do so, and only with the correct licencing, registration and other documents and practical experience that may be required.*
- *Where you could foreseeably be stranded, particularly in winter or when cold, it is advised to carry a suitably warm blanket and dress to stay warm. Keep means of contacting help available to you and be aware of your surroundings. Ensure phone(s) are charged up as much as possible.*
- *Ensure you report all accidents, incidents and near-misses/dangerous occurrences. There may be no need to report some events immediately, but ensure they are reported as soon as it is safe and appropriate to do so.*
- *Ensure you have appropriate insurance for the work you do, and the correct licence for the type of vehicle you are driving.*
- *An appropriate, valid licence for the vehicle(s) being driven is required as part of a BRE due diligence check. Licences will be checked by line managers in accordance with due diligence protocol and records of these checks kept on file.*
- *Where you believe you may be late, where safe to do so, call to inform interested parties including line managers to inform them.*

Dust & Respiratory Inhibitors

Often, the impact of dusts on the respiratory system is significantly underestimated. It has been demonstrated conclusively by medical science, however, that even a small amount of dust exposure can have a significant impact on the respiratory system, and as such, suitable systems and controls need to be given effect for your protection. As such, have ensured that:

- *Risk assessments to be produced to ensure awareness of how to control respirable dust hazards and should identify suitable PPE to be worn to the desired standard.*
- *Face-fit testing to be applied to all masks worn by operatives undertaking dust-producing activities or working in dusty areas.*
- *Toolbox Talks are to be undertaken for all who undertake dust-producing activities or who work in dusty areas. Toolbox Talk provided, with all staff signing to agree they have read and understood the information provided.*
- *Appropriate information, instruction, training and supervision to be provided*
- *Appropriate PPE/RPE as identified in the risk assessment*
- *Guidance literature available on the shared drive*
- *Damping down items being cut established as good practice to the end of reducing dust activation and inhalation*
- *Industrial vacuum cleaners to be used to clear away dust, rather than sweeping, which activates dust into the air, wherever possible.*
- *Screening and dust suppression controls to be given effect at every activity where dust production is a significant risk to health, either for those undertaking the works, or others who may be affected by their acts and omissions, or lack of same.*

Electricity/PAT

A significantly underestimated hazard, electricity is a killer that has is largely imperceptible until a mistake is made, and we need to ensure that hazardous energy is well-managed and controlled as possible. As such, BRE insist that:

- *Only competent persons to work on/near electrical systems.*
- *All works around electrical services shall be undertaken under the authority of a method statement and a permit to work.*
- *All necessary PPE shall be provided and worn.*
- *PAT Testing shall be carried out in conjunction with the relevant risk assessment*
- *Fixed wiring checks shall be undertaken five yearly.*
- *It must be ensured that wires/cabling is not exposed to water under any circumstances.*
- *Energy efficiency regime being established to avoid lights being on when not in use.*
- *Electrical energy use is being monitored to establish a suitable baseline with a view to monitoring over the next cycle, to reduce emissions, heat loss and energy consumption.*



Title: Health, Safety & Environmental Management

Date: 18 October 2022

Document No: XA10

Revision: 2.0

- *LOTO procedures given effect within the business.*
- *Segregation from works where electrical works are taking place.*
- *Specialist contractors are engaged to work on HV electrical systems.*
- *Warning signs to be erected to warn of hazards.*
- *Staff are asked to ensure that they avoid leaving lights on or devices on standby, or on a setting whereby accidental activation is possible. This should typically mean isolation of the device from the power source.*
- *Electrical safety awareness shall make up part of the content on the new training system from Skillsoft.*

Emergency Procedures/Response

Without emergency procedures, the organisation would fail in its endeavours to be prepared for an emergency scenario. As a result, the organisation not only has to need them in place, it has to communicate them and staff need to be drilled in them to be adequately prepared and familiar with the processes to be followed if an emergency scenario were to occur. To this end, BRE have ensured:

- *Emergency procedures have been established and are communicated through the emergency plan, a document subject to annual review and updates by Estates.*
- *Updates will be appropriately communicated by email, once the document are approved, and the document will be available via SharePoint.*
- *Assembly points are regularly checked for anything hazardous or any obstructions along exit routes.*
- *Signage is surveyed regularly for accuracy, damage or other issues.*
- *Drills are undertaken to improve processes and highlight any issues, with lessons learned put into practice.*
- *Feedback on drills is provided in brief, to enable lessons to be learnt and discussed at local level with staff.*
- *Records of emergency drills are kept in Estates.*
- *Estates may be contacted by anybody seeking to report an issue or clarify something regards emergency procedures (or any other related facet of operations).*
- *Poor emergency drill execution will result in another random drill being scheduled soon after.*
- *Failure to cooperate on drills may result in disciplinary action.*
- *Annual reviews of the emergency procedures are undertaken.*

Employee Engagement

Engagement of employees (and indeed all others who could be affected by our acts/omissions), and as such, the company takes its statutory duties to provide adequate information, instruction, training and supervision, and to ensure suitable communication with all who need it.

A range of channels for communication shall be utilised as described below, however, this list is not exhaustive, and we shall seek to use the most appropriate form of communication for the message to be put forward:

- *Policy, sign on sheets*
- *Risk assessments, sign on sheets*
- *Method statements, sign-on sheets*
- *Permits-to-work, sign-on sheets*
- *Awareness campaigns*
- *Training (traditional and online)*
- *Email correspondence*
- *S-Plan documentation, meeting minutes, etc.*
- *Publication of audit results, accident stats, and similar*
- *Production and publication of procedures and processes, including feedback mechanisms*
- *Safety, health and environmental groups/committees*
- *Safety, health and environmental management notice boards*
- *Memos*
- *Appropriate levels of guidance and supervision made available*
- *Review of all accidents, incidents, near-misses, dangerous occurrences, and occupational ill-health, and provide prudent feedback, updates to procedures and processes and other elements of the OH&SMS, EMS or QMS in accordance with findings, which again, are communicated to IPs.*



Endangered species

There are known endangered species on site and locally, particularly on local SSSIs. As such, BRE insist on

- *Awareness of some endangered species being present on site.*
- *Suitable response to campaigns/guidance material*
- *Compliance with our standpoint of non-interference with any flora and fauna on site, even to move them from a possible place of danger.*
- *Monitoring by external agencies (i.e, Environment agency)*
- *Warning signs to be erected to warn of the potential for endangered species to be present.*

Environmental Impact

Because understanding our environmental impact is critical, we analyse and aspects of the business that could cause harm and attempt to assess and measure the relevant impact on the environment. This will enable us to reduce bad practices and harmful behaviours whilst promoting positive practices and behaviours. To this end,

- *S-Plan are monitoring and measuring environmental impact in conjunction with Estates, to reduce the impacts of business aspects on the local environment.*
- *Environmental impacts and aspects assessments are in place, and updated periodically*
- *Where required, method statements and permits to work will place conditions concerning environmental impact on works to be undertaken.*
- *All reasonable steps are taken regarding controlling all elements of environmental impact.*
- *Visits from the Environment Agency and Public Health England also advise us as to understanding our environmental impacts, so that we can begin to reduce impacts so far as possible, in-line with our objectives, targets and key performance indicators*
- *Energy efficiency regime being established to avoid lights being on when not in use.*

Ergonomics

Ergonomic comfort is something BRE are looking to achieve in all facets of the business and rely on your assistance to make sure that you are comfortable in your PPE/RPE, when using furniture, or when present at your workstations or in any other circumstances related to work. As such,

- *Any uniform, or PPE shall be suitable for the size of persons using it, including face-fit requirements, and a suitable (sensible) backstock of PPE in case of failure or damage.*
- *DSE/workstation-related equipment shall be adaptable to provide any reasonable adjustment required for comfortable, ergonomically sound working.*
- *Elements of equipment in which people sit (FLTs, cars, etc) shall be sourced with ergonomic comfort in mind to enable as much reasonable adjustment to the devices as possible.*
- *Where ergonomic comfort cannot be achieved, this will be referred to health and safety personnel for feedback and resolution possible.*
- *Provision of adequate information, instruction, training, and supervision is made to the extent it is required.*
- *Staff using ergonomically adaptable equipment are to read manufacturers' literature and use it as directed.*

Estates Management

Estates compliance for environmental, health and safety management is core to the thinking of BRE, in that relevant systems are put in place to manage buildings, their facilities, operations, services and supplies. BRE has therefore implemented environmental health and safety management through the following:

- *Estates management processes are being continually refined to ensure a well-rounded approach to safety, health and environmental management, including reviews of paperwork, processes and procedures, against criteria for UKAS, and ISO audits.*
- *Projects are managed through Estates' project managers, who liaise with the Head of SHE, the SHE Manager and other parties to ensure projects run as smoothly as possible.*
- *Feasibility studies and impact assessments are undertaken for all relevant works, and a regime of audit, inspection and monitoring is in place, to ensure suitable good practice and compliance in regard to all aspects of environmental protection, and health and safety management.*
- *Estates have suitable resources available to them to ensure suitable communication of any health and safety, environmental, or indeed, quality issue.*



- *Estates are authorised to end any activity which is having, or is likely to have, an impact on environmental protection, and health and safety management, including works being undertaken in a dangerous way. Where prudent, this also includes authorisation to remove people working unsafely from site or implement disciplinary procedures.*
- *Provision of adequate information, instruction, training and supervision is made to the extent it is required.*

Events/Filming Projects

Events and filming projects add revenue and status to the BRE site in Garston. We have a good relationship with film crews who use the site regularly and whose safety, health and environmental standards at least rival our own. We aim to ensure this continues that that all involved work to the highest standards of safety, health and environmental concern possible, by means of:

- *Organising events and filming centrally through the Estates team, in conjunction with anyone who may be affected by the event(s) being put together.*
- *Appropriate safeguards are put in place and documented in risk assessments, method statements and permits to work, where required.*
- *Appropriate insurance and segregation are available to ensure events to not impact anyone inadvertently.*
- *Monitoring of events is done by the Estates team.*
- *Provision of adequate information, instruction, training and supervision is made to the extent it is required.*
- *On-site trades will be placed on standby to attend events and make good any issues arising.*
- *Security is advised in advance of the arrangements for bring events on site and are advised of the names and contact information of those coming onto site.*
- *Familiarisation of filming crews with BRE emergency procedures is required, to determine applicability of arrangements and produce any new/additional procedures for such activities*
- *All events require risk assessments to be produced, and certain activities require method statements and permits to work where they may be complex or inherently dangerous.*
- *This SSW is to be approved by Estates, and Senior Management, prior to events being given the go-ahead.*
- *Warning signs to be erected to warn of hazards/requirements surrounding filming zones, and segregation put in place to prevent unauthorised access to set.*

F-Gas

Recognising the overlap here in regards health and safety, and environmental concerns, F-Gas equipment is logged in a register that is updated periodically. All such products are maintained and risks to health, safety and environment are mitigated to the fullest extent possible by means of:

- *F-Gas register in place and maintenance regime implemented.*
- *Application of the fullest extent of the law and good practice.*
- *Information, instruction, and training provided in regard to any relevant identified health effects.*
- *Competent contractors engaged to undertake work on F-Gas products.*
- *Reporting processes in place to report faulty F-Gas products*
- *All works involving F-Gas maintenance and associated activities to be risk assessed and works undertaken under the authority of a method statement and permit-to-work.*

Fire Safety & Hot Works

Fire safety is an area of paramount importance to BRE, not least due to the fact that we are market leaders in the testing, research and development of fireproofing, fire suppression equipment and components and other items, but also because the site is so extensive, and its activities so diverse, that we need to ensure we manage fire safety, including hot works, for the preservation of life, health, and avoidance of damage to property and premises.

- *Fire alarm systems and panels suitably maintained*
- *Emergency lighting regularly tested in accordance with statutory obligations and good practice.*
- *Fire doors/exits surveyed daily and maintained.*
- *Fire risk assessments currently under review and update across the site. These are to be checked every 3 years, and accordingly updated, however, the list of actions in the fire risk assessment will be checked against deadlines set by the assessor.*



- DSEAR assessment updated every 3 years unless a review is triggered by a significant change.
- Emergency drills undertaken annually for low-risk buildings, and more frequently where the risk profile is considered medium-high risk.
- Drills that are considered to have been poorly executed so as to constitute a failure (i.e. risk to life, or particularly casual in their execution by staff) will be subject to a further test after an report has been issued to the building manager, detailing shortcomings. Further action may be taken if a 2nd fire drill is considered to have been poorly received.
- Checklists for feedback on fire drills are produced.
- Specialist contractors maintain all fire safety provisions on behalf of the organisation (extinguishers, alarms, panels, electrical components, etc).
- Estates personnel are familiar with fire safety management and as part of continuing CPD, shall be undertaking advanced fire safety management training.
- Adequate information, instruction, training and supervision related to fire safety provided at all levels.
- All fire doors are being upgraded to LPCB fire doors when they are replaced in the current regime.
- Daily checks of fire doors and fire exits systematically undertaken.
- Staff empowered to report dangerous situations which may lead to fire.
- Strong procedures established in the Burn Hall and Furnace Hall for the mitigation of fires starting and spreading. This includes a full SSW for all activities undertaken, be they routine or not.
- Segregation of waste management, including the separation of fuel and ignition sources, both internally and externally.
- Hot works are only to be undertaken by competent persons, with specific controls in place, with risk assessments, method statements and permits-to-work put in place to govern work practices.
- All hot works to be monitored by health and safety/Estates teams.
- Appropriate fire hose and fire safety training is available to those who need it.
- Anti-static wipe-downs of all surfaces to be heated, and the surrounding works area to the extent sensible, to avoid static electricity becoming an ignition source.
- **60-minute fire watch on all hot works**, except on timber-framed structures, where there shall be a **two-hour fire watch**.
- Warning signs to be erected to warn of hot works operations in progress.
- Segregation by means of inflammable screening and other suitable controls.

First Aid/Mental Health First Aid

In recent years, the psychological, emotional and mental wellbeing of staff has come to the forefront of health and safety management. There has often been a reluctance to talk about this, from both employers and employees, with a lack of specialist advice available, alongside a lack of willingness to open up about such problems for fear of being labelled, marginalised or, in some cases, people fearing for their job. BRE take a rational, proportionate and people-centred approach to managing mental health first aid, which is important for the overall welfare of the individual, and consider this as important as traditional first aid, for which suitable provision is made in such a way as to at least meet, if not exceed the expectations of the Health and Safety (First Aid) Regulations. This is achieved through the following means:

- A first-aid (needs) assessment has been given effect and is reviewed periodically.
- Proportionate number of first aiders are on site, and their details provided in the needs assessment.
- BRE have two mental health first aiders available, one of whom is an instructor.
- First aid boxes placed around the site, stocked, and monitored for stock levels by first aiders.
- First aid room available.
- Emergency procedures for contacting emergency services and advising security on main gate that emergency services are on their way are in place.
- AEDs on site, and personnel are trained in their safe and appropriate use.
- Sourcing of suitable training from reliable approved trainers
- Travel first aid and burns kits available
- Full compliance with the Health & Safety (First Aid) Regulations

Goods Inwards (Operations)

Good inwards is a significant cog in the BRE operation, and includes a number of administrative and set-up work for the organisation, including receipt and sending out of deliveries, involvement in logistical operations from skip-tipping and hazardous waste operations, through to collection and movement of resources around the site. With a



wide variety of activities undertaken, a number of control systems have been given effect to manage the safety, health and environmental concerns, including:

- *Spill-kit training*
- *Other mandatory and recommended training from the LMS and as required by the job role(s), including manual handling training.*
- *Full SSW in place, with any required permits issued by Estates*
- *Adequate, periodic emergency procedure tests in place*
- *Experienced, competent operatives and managers are well aware of their HS&E responsibilities*
- *Appropriate information, instruction, training and supervision provided and further such to be provided where needs arise.*
- *Emergency systems and panels suitably maintained*
- *Emergency lighting regularly tested in accordance with statutory obligations and good practice.*
- *Emergency drills undertaken annually.*
- *Adequate information, instruction, training and supervision provided at all levels.*
- *Staff empowered to report dangerous situations which may lead to fire, dangerous or emergency situations.*
- *Segregation of waste, including the separation of fuel and ignition sources, internally and externally.*
- *Good practice storage practices in place for COSHH and similar substances and materials.*
- *Full compliance with the requirements of relevant statutory provisions.*
- *All equipment and activities to be fully risk assessed, and staff must be familiar with and understand the risk assessments to which they are signing on.*
- *All risk assessments to be reinforced with method statements and permits-to-work where tasks/activities are considered complex or inherently dangerous. Again, staff must be familiar with and understand the risk assessments to which they are signing on.*
- *Only competent, trained persons to operate equipment that will be used, and which may carry risk.*
- *Staff must never attempt to defeat controls/safeguards implemented for their protection or the protection of others.*
- *Appropriate information, instruction, training and supervision supplied.*
- *Manufacturers' literature to be available and consulted in regards any issues that may arise.*
- *Repairs only to be undertaken by those competent to do so.*
- *Never take shortcuts to save time on work activities with any piece of equipment, no matter how benign the risks may appear to be.*
- *(See 'Hazardous Waste' for other controls given effect).*

Hazardous Waste

Waste management is a key element of S-Plan and hazardous waste is now a part of the S-Plan group's monitoring remit. We engage specialist contractors to handle hazardous waste, and with a focus being put on management and re-use of waste wherever possible, it will be managed in the following ways:

- *Full compliance with relevant requirements of the Hazardous Waste Regulations 2005.*
- *S-Plan monitoring of hazardous waste has been implemented*
- *Suitable objectives, targets and KPIs in place to mitigate risks from hazardous waste types.*
- *Appropriate PPE and RPE issued to those who need it.*
- *Adequate information, instruction, training and supervision provided as needed.*
- *Suitable sealable receptacles of sufficient type are present in which to store hazardous waste.*
- *Contractor management and due diligence checks*
- *Appropriate registers of waste kept identifying waste types, quantities and disposal methods.*
- *Toolbox Talk issued regarding hazardous waste*
- *Where waste forms can be put into 'waste to energy' or other such programmes without becoming a hazard, this avenue will be explored.*
- *It shall be explored in ongoing fashion whether hazardous waste we are disposing of can be used by other industry sectors prior to actually being wasted.*

Helpdesks

Helpdesks are a critical function of BRE key departments, and their functions are reinforced for safety, health and environmental benefits in the following ways:

- *Helpdesks have access to professional internal safety, health and environmental advice.*



- *Requests for specialists to attend site to sort out safety, health and environmental issues can be made directly to the helpdesk for consideration by the Head of Estates.*
- *Helpdesks are able to advise on active policies, procedures and processes, although may require to establish details before returning a response.*
- *All manner of health, safety, environmental and other concerns can be made to/through helpdesks for resolution.*

Laboratory Testing (Incl Burn/Furnace Hall)

Laboratory testing, research and development is a core activity of BRE, and many of the activities are complex and inherently dangerous, particularly those associated with fire-starting or radiation, and as such, it is the case that BRE require extra steps to be taken to mitigate the risks posed. As such, this list of control systems has been given effect, although may be added to at the discretion of Senior Management for the mitigation of risks to persons, property, premises and the environment:

- *Full SSW in place, with permits issues by Estates*
- *Adequate, periodic emergency procedure tests in place*
- *Experienced, competent lab operatives and managers are well aware of their HS&E responsibilities*
- *Appropriate information, instruction, training and supervision provided and further such to be provided where needs arise.*
- *Labs, burn hall and furnace hall constructed to rigorous British and other standards to ensure the highest standards of environmental protection, and health and safety management are achieved.*
- *Fire alarm systems and panels suitably maintained*
- *Emergency lighting regularly tested in accordance with statutory obligations and good practice.*
- *Fire doors surveyed and maintained.*
- *Fire risk assessments currently under review and update across the site. These are to be checked every 3 years, and accordingly updated, however, the list of actions in the fire risk assessment will be checked against deadlines set by the assessor.*
- *DSEAR assessment updated every 3 years unless a review is triggered by a significant change.*
- *Emergency drills undertaken twice annually. Whilst the risk profile has been lowered considerably by the implementation of home-working practices, it is essential that we continue to conduct drills as familiarisation with processes is essential, and this puts us in a better position for potential post-Covid returns to work.*
- *Checklists for feedback on fire drills are produced.*
- *Specialist contractors maintain all fire safety provisions on behalf of the organisation (extinguishers, alarms, panels, electrical components, etc).*
- *Estates personnel are familiar with fire safety management and as part of continuing CPD, shall be undertaking advanced fire safety management training.*
- *Adequate information, instruction, training and supervision related to fire safety provided at all levels.*
- *All fire doors being upgraded to LPCB fire doors when they are replaced.*
- *Staff empowered to report dangerous situations which may lead to fire.*
- *Strong procedures established in the Burn Hall and Furnace Hall for the mitigation of fires starting and spreading. This includes a full SSW for all activities undertaken, be they routine or not.*
- *Segregation of waste, including separation of fuel and ignition sources, both internally and externally.*
- *Hot works are only to be undertaken by competent persons, with specific controls in place, with risk assessments, method statements and permits-to-work put in place to govern work practices.*
- *Systematic and comprehensive fire suppression systems in place.*
- *All hot works to be monitored by health and safety/Estates teams.*
- *Appropriate fire hose and fire safety training is available to those who need it.*

Lighting Levels

The health of the individual is dependent on the control of a number of workplace factors. The correct amount of light can make a significant difference in the health of staff members' eyes and their ability to live a quality of life. As such, BRE endeavour to make use of lighting including natural light to fully maintain staff members' vision possible:

- *Lighting levels to be maintained as to be sufficient for staff to clearly see and avoid eye strain.*
- *BRE encourage the use of natural light to avoid detriment to the eyes, and all other factors which influence the health of the eyes.*
- *Use of DSE equipment in poor/low lighting levels is prohibited.*
- *Routine maintenance is readily available on site for repairs to luminaires, and for changing light bulbs.*



- *Lighting levels will vary with the purpose of the area being worked in. For detailed work requiring good vision and dexterity to undertake works, more highly powered lighting is available.*
- *Guidance literature complements appropriate information, instruction, training and supervision.*

Lone Working

Wherever possible, BRE seek to eliminate lone working, however, also appreciate that this is often not possible to achieve, particularly in light of the reduction in staff on site due to the Coronavirus outbreak. Where lone working cannot be avoided, it should be managed in the following manner:

- *All lone working is to be reduced to a minimum, or preferably eliminated, wherever possible.*
- *Vulnerable persons to be identified and anybody requiring special attention or reasonable adjustment should be provided with any such assistance to make their workspace safe.*
- *Check calls may be required at the discretion of supervisors, managers of similar, particularly if the workspace risk profile cannot be significantly reduced.*
- *Means of communication to be used wherever suitable to do so.*
- *Monitoring by supervisors/others to be undertaken where lone workers are on site and need to be checked on.*
- *Vulnerable persons, those with serious health conditions, and those at risk of workplace violence, to be excused from lone working where required.*
- *Utilisation of monitoring equipment (including CCTV) where possible to remotely monitor the safety of employees and others working on the organisation's behalf.*
- *A suitable and sufficient risk assessment to be given effect and works only to be undertaken under the authority of a method statements and a permit to work, the latter being issued by Estates.*
- *Application of the fullest extent of the law and good practice.*
- *Information, instruction, and training provided regards any identified hazards, and proportionate to the risk profile of the work.*
- *Only competent persons to undertake work on a lone working basis, any then only where acceptable to do so (i.e., not possible with hot works, complex or inherently dangerous tasks).*

Management Of Persons & Behaviours

Behaviour modification strategies are not a new thing; however, they are a necessary reinforcement of controls in order to ensure that people have the right attitude towards safety, health and environmental concerns. Whilst we do not ask BRE personnel to obey without thinking or questioning, we do ask that staff be aware of the implications of their acts and omissions, and the potential consequences, modifying their behaviour accordingly whilst at work, in order to behave in such a way that enhances safety, health and environmental performance, reduces negligent acts which can result in injury, ill health or worse, or damage to the site and environment. To this end:

- *Those in charge of persons will be responsible for managing behaviours, values and attitudes (culture) in respect to the overall behaviour of persons.*
- *This includes the management of environmental factors dependant on positive personal behaviours, values and attitudes.*
- *Relevant reward and disciplinary procedures are in place to ensure that positive behaviours are rewarded, and negative behaviours are eliminated.*
- *Open door policy to entertain grievances, complaints and reports of dangerous or potentially harmful behaviours.*
- *Relevant authority is given at different levels of management to act upon grievances, complaints and reports of dangerous or potentially harmful behaviours, to ensure that issues that can be dealt with locally are dealt with, and more serious matters are escalated accordingly.*
- *Relevant information, instruction, training and mentoring/upskilling provided to managers to undertake/deal with the behaviourist elements of their role.*
- *We ask and expect staff to be a living example of our policies and priorities whilst at work, giving adequate respect to the work environment and natural environment, leaving it without risks to health, safety and the environment.*

Manual Handling

Manual handling results in many avoidable injuries simply through bad practices, ignorance of the best way to do things, and poor manual handling technique.



Title: Health, Safety & Environmental Management

Date: 18 October 2022

Document No: XA10

Revision: 2.0

To this end, we have given effect to the following systems and expectations with a view to managing Manual Handling in as suitable a way as possible.

- *All manual handling tasks risk assessed and significant findings to be communicated.*
- *Appropriate information, instruction, training and supervision provided, including appropriate manual handling technique.*
- *Staff should only lift what is comfortable for them and within their individual capabilities.*
- *Manual lifting to be minimised (preferably eliminated), and mechanical assistance to be utilised wherever possible.*
- *Absolutely no lifting to be done by vulnerable persons, those with underlying health issues that may be triggered by manual handling tasks, or new/expectant mothers.*
- *Appropriate good practice to be adopted in that journeys are to be planned before lifts are undertaken, and that any suitable PPE gloves, body protection is provided.*
- *Staff to escalate poor manual handling practices and unrealistic/bad practice demands placed on them.*

Measurement Of Health & Safety Performance

Performance measurement is vital for the business to find out where it currently operates relative to its objectives and targets. This is usually measured against relevant statutory and voluntary standards, KPIs and relevant statistics from reports made in various parts of the business. This usually means the completion of paperwork, however, this is not 'red tape', and BRE would like to encourage their staff and others to see it as a necessary piece of enabling work that allows the company to determine how the company is performing in regards quality, health and safety, environmental protection and any other facet of the business under review, be it ITC, communications, security or other such elements. Within BRE, measurement occurs as a result of:

- *LMS Reporting for training.*
- *Audits, inspections, monitoring and measurement.*
- *S-Plan environmental management targets/objectives and KPIs.*
- *Senior management reviews.*
- *KPIs for health, safety and general wellbeing monitored against objectives and targets.*
- *Checklists.*
- *Accident, incident, near-miss, ill-health and dangerous occurrence statistics.*
- *Formal interaction volumes.*
- *HS&E Forums/Groups*

Mental Wellbeing, Stress & Psychosocial Factors

In recent years, it has become obvious why many people are having to take time off work for non-injury related issues, and chief among them are stress, and for recovery time for mental and emotional wellbeing, particularly where psychosocial factors (including bullying, harassment, etc) and overbearing/unrealistic workloads have been placed on them. This is not just something that clearly affects the business' ability to operate, and not just something that affects the bottom line of the company, but something that affects the quality of life and emotional stability of those working on behalf of the organisation, and as such, BRE acknowledges its duty of care to ensure that we suitably mitigate stress, psychosocial factors and their effects by whatever means necessary. As such, we have implemented the following measures to mitigate the risks so far as possible:

- *Stress risk assessment in place*
- *Mental health first aiders available via Teams and on the telephone when not on site.*
- *Mental health first aid literature available.*
- *Office facilities maintained.*
- *Lone working eliminated where required.*
- *Supervisors and Managers to monitor the mental health symptomology of staff in their care.*
- *Suitable levels of human contact through virtual meeting and other tools*
- *Workload reviews upon request.*
- *Signposting to relevant counselling and other resources through mental health first aiders.*
- *Understanding from BRE in regards workplace pressures being amplified by working at home, particularly where home life needs managing through the Covid-19 outbreak, and pro-active decisions made to avoid home life becoming overbearing on staff.*
- *Zero tolerance towards bullying and workplace violence in all forms, including harassment.*
- *Progressing towards balancing workload to prevent stress and combat any forms of mental ill-health that may arise from unrealistic workloads, expectations and targets.*
- *Mental health first aiders available to be and more to be trained in due course – volunteers welcomed.*



- *Aggression towards staff (by other staff, or by 3rd parties) shall not be tolerated.*
- *Aggression by staff or 3rd parties towards contractors, visitors, clients, tenants or others shall also not be tolerated.*
- *Grievance and support procedures in place to deal with all manner of psychosocial and workplace violence problems. Due diligence processes to deal with accusations and to investigate issues arising thoroughly, and with due concern for confidentiality towards all concerned.*
- *Line managers and those further up the chain of command are empowered to intervene before a small issue takes root and causes further upset.*

New/Expectant Mothers

New/expectant mothers are particularly vulnerable to many specific hazard types including radiation, manual handling and anything else with the potential to exert a force upon their body, or otherwise affect their general wellbeing. As a result, BRE have endeavoured to ensure a suitable level of protection for new/expectant mothers which complies with, and hopefully exceeds the requirements of the law:

- *Home working wherever possible is encouraged to minimise potential for Covid-19 spread.*
- *No lifting at all during the pregnancy.*
- *Guidance literature to be provided to new/expectant mothers, in regard their personal health management, and eventual return to work.*
- *Suitable and sufficient new/expectant mothers risk assessment to be undertaken in accordance with CIPD/HSE and other relevant advice*
- *Guidance literature to be provided by BRE to new/expectant mothers.*
- *No works to be undertaken around radiation sources by new/expectant mothers, particularly those who are breastfeeding.*
- *Advice provided in writing from physicians shall be prioritised to ensure the health, safety and wellbeing of those*
- *Where time off is required for new/expectant mothers, this shall be treated as a reasonable adjustment and the organisation shall demonstrate flexibility in its approach on a case-by-case basis.*
- *Relevant information, instruction, training and supervision is to be provided as required*
- *Reviews of the risk assessment on a month-by-month basis with line managers and HR, through an informal discussion via Teams or other suitable media.*

Noise

Controlling noise is a significant item on the list of concerns for BRE, firstly in regard to our staff, but also in regard to being a good neighbour to the estates surrounding the site, and ensuring that wildlife in the area, some of which is endangered (both on our site and SSSI's around the site), is not disturbed by the level of noise coming from the site. Therefore, BRE seeks to ensure that we:

- *Actively try to reduce noise produced throughout the site to be good neighbours to the surrounding community and staff.*
- *Ensure suitable types of PPE are made available to arrest the ill-health effects of exposure to noise.*
- *Actions are undertaken at both the upper and lower action levels, and prior to this where necessary.*
- *Noise-producing tasks are to be risk assessed, and noise assessments undertaken to determine whether they pose a likely risk to health.*
- *Management and engineering controls are implemented as necessary.*
- *Appropriate levels of information, instruction, training and supervision are provided for noise-producing activities.*
- *Planning undertaken to eliminate all noise-producing activities, asking whether activities need to be undertaken, and whether there are less noisy ways of undertaking works.*
- *Ongoing noise assessments undertaken at peak noise/work times.*
- *Warning signs to be erected to warn of hazards in noisy areas.*
- *Activities seeing regular exposure to noise levels near or measuring 80dB(A)+ shall be thoroughly risk assessed, with regular medical checks put in place.*

Nuisance/Statutory Nuisance

BRE take seriously our commitments and statutory obligations towards environmental management and protection, and equally seek to ensure that we eliminate statutory nuisance to the fullest extent possible. In environmental law, 'nuisance', or 'statutory nuisance', includes factors that may spoil the enjoyment of ones' environment, **including noise, smoke, dust, steam or smell, accumulations or deposits, badly kept animals, vibrations, fumes or gases,**



intrusive artificial light, rubbish/fly-tipping, problems animals or insects, and certain types of premises in a poor state of repair. To ensure that we do, to the best of our ability, adhere to statutory requirements and eliminate causes and effects of statutory nuisance, we have given effect to the following:

- *BRE Policy to elimination statutory nuisance with suitable controls financed and maintained.*
- *Environmental aspects and impacts risk assessments are undertaken and reviewed by Estates in conjunction with activities and their results/byproducts on site in order to recognise causes of statutory nuisance and the controls that could be effectively implemented to mitigate the risk(s).*
- *BRE/Senior Management remain committed to preventing pollution through the segregation and marshalling of waste types and quantities, so as to measure waste production and appropriately control it through the setting of realistic 'smart' objectives within the EMS.*
- *Liaison with neighbours is undertaken to ensure BRE are not presenting a statutory nuisance to the area.*
- *BRE monitor, in conjunction with Thames Water, trade effluent with samples taken and the results analysed in specialist laboratories.*
- *BRE are segregating persons on site from water courses on site to prevent pollution or contamination of the water courses. Sampling is also undertaken to monitor the purity of the water courses.*
- *Regular/periodic cleaning regimes are in place for the site as a whole, to minimise dust presence and concentration, and the ability of dust to cause a public health nuisance. This is also in effect to minimise, or preferably eliminate the build-up of deposits or accumulations of dirt, dust and detritus, and includes a periodic cleaning of gutters, gullies and grease traps.*
- *Waste removals are sufficient to prevent excessive smell and mains/waste pipes from which steam is emanating will be dealt with where nuisance is discovered.*
- *Care is taken to manage resources, and clear away any article or substance that may attract animals, insects and vermin, or harm the endangered species present on the site.*
- *Consignment notes and invoices are kept, ensuring waste contractors are unable to fly-tip or otherwise discard waste in such a way that it damages the reputation of BRE, and shows them accountable for their collections.*
- *Buildings are surveyed and their condition monitored in accordance with relevant statutory provisions, to avoid them falling into a state of disrepair that may constitute a statutory nuisance.*
- *Damping down and minimising the presence of dust, fumes and gases through LEV and other means is standard practice throughout the site.*
- *Activities are planned so as to avoid using materials or means of producing black smoke or dark smoke which is seen as an environmental nuisance and restricted under the 1993 Clean Air Act.*

Occupational Health/Health Surveillance

An occupational health specialist is present on site and referrals can be made via HR/Health and Safety. The service is made available to those who need it. Health surveillance is available to those who work in situations that expose them to certain risks within the business, including (but not limited to) those working in labs. The organisation may state that health surveillance is a condition of employment where risk of exposure is a possibility, so as to form part of our due diligence and safeguarding checks and may be insisted on as an additional element of the SSW.

- *Visiting occupational health specialist available.*
- *Health surveillance is required for those who regularly work with, or who are exposed to, anything that may affect their health, which includes, but is not limited to substances which may cause burns or dermatitis, exposure to respirable dusts, gases and fumes, including asbestos fibres.*
- *Health surveillance is also required for potential pathogenic exposure, when working night shifts, or interface with any other significant hazard that may have an adverse health impact (e.g, COSHH substances, mercury, etc.)*
- *At its discretion, BRE may source specialist consultants and physicians to ensure that the right type of health surveillance is undertaken for specific needs to be met.*
- *Failure to attend health surveillance sessions is a disciplinary offence*
- *Where your GP or local NHS services can provide free health surveillance suitable for your needs, this is to be utilised.*
- *BRE will allow time off for the examination, however, this is not 'time off', so much as part of your recognised work hours.*



Office Safety (General)

Whilst offices are not deemed the most hazardous of environments, many people still manage to injure themselves by underestimating the dangers of items such as poor cable discipline, working with damaged cables of electrical equipment, and slipping/tripping on various floor surfaces for one reason or another. As such, to ensure safety in office work environments, the following systems and expectations are placed upon those working in such environments:

- *Buildings have suitable air flow, and this is contributed to through opening of windows and opening of doors within the building as necessary (except for fire exits/fire doors). Air flow is also assisted by use of air conditioning systems in some buildings.*
- *Equipment is PAT tested, and electrical systems are fixed wire tested 5 yearly in accordance with statutory obligations.*
- *Prior to use, a basic visual inspection is expected of equipment to ensure there is nothing evidently wrong before use. If in doubt, draw the attention of any issues to a manager who will be able to make a suitable, safety-led decision.*
- *In an attempt to stop the spread of Coronavirus in the office, staff numbers have been heavily reduced on site, and those who remain are working several meters apart. Literature has been provided for office users to assist them in keeping safe.*
- *Ensure suitable cable discipline and avoid using damaged, kinked or otherwise substandard cables or equipment.*
- *Reporting procedures in place to report substandard equipment, floor surfaces or dangerous situations.*
- *Ensure the use of suitable footwear to avoid slipping or tripping on floor surfaces, finishes or linings.*
- *Ventilation is checked periodically as per the F-Gas regulations, and remedials undertaken as necessary in areas of the site where such equipment operates.*
- *Visitors are to sign in when attending site, using the Envoy system in Estates (3rd Floor, B14).*
- *All visitors should sit through a standard induction, although those on site only for a short time, who are at ALL TIMES accompanied by an inducted member of staff, may, at a manager's discretion, attend site without being formally inducted, so long as the critical safety information is made known to them.*
- *Services are tested periodically (including PAT tests and fixed wiring, GasSafe tests including benchmarking for boilers, and insurance exams are provided for specific equipment including pressure vessels.*
- *A report is produced for the building manager of each drilled area, and further drills will be scheduled where the performance is poor, after a lessons learned TBT has been provided by those whose teams did not perform as expected.*
- *Equipment is to be used as directed by manufacturer (i.e., no horseplay spinning around on office chairs or climbing on office desks to install or remove lightbulbs, etc).*
- *Offices are to be maintained and kept in a suitably safe condition, including access and egress, safe routes (the making free of obstructions, slip, trip and fall hazards), and the installation of safe equipment, as well as guaranteeing the availability of emergency provisions.*
- *Workstations are to be ergonomically set-up to the fullest extent possible in compliance with reasonably adjustments required by the DSE Regulations and Equality laws.*
- *Sufficient rest breaks providing time away from screens/monotonous work are required, to assist in maintaining levels of mental health.*
- *Appropriate information, instruction, training and supervision supplied.*
- *Induction undertaken.*

Operation Of Mobile Plant & Equipment

The operation of mobile plant and equipment comes with its fair share of hazards and most scenarios where those hazards are to be realised can be legislated for.

As such, it is reasonable in the opinion of BRE that specific safeguards are taken to ensure that mobile plant and equipment can be operated safely and without risk to health, including:

- *Only competent, trained persons to operate mobile plant and equipment*
- *Pre-operation inspection to be undertaken prior to use to ensure, so far as is reasonably practicable, fitness for use.*
- *Appropriate information, instruction, training and supervision supplied.*
- *Those being upskilled may only operate equipment under the direction of competent persons.*
- *Safety devices are present on plant and equipment, and BRE expects that operators will not take it upon themselves to defeat them or override them for the sake of saving a few seconds here and there in the execution of work tasks.*



- *Manufacturers' literature to be available and consulted in regards any issues that may arise.*
- *Staff to be advised as to what is within their remit to 'fix' and what items must be left to a specialist competent person to make good.*
- *Difficult routes are to be walked before moving plant/equipment that can easily become stuck in potholes or is subject to other such problems*
- *Warning signs to be erected to warn of hazards.*

Parking On Site

There is reasonable parking space on site for staff, visitors, contractors and others, however, there are certain restrictions on parking in certain areas and BRE expect site users to respect the rules and restrictions laid down. Parking in restricted zones or in parking bays specifically reserved for those with protected characteristics under equality laws may be subject to disciplinary action if they park where they shouldn't. As such:

- *It is the responsibility of vehicle drivers to be aware of speed limits and space available in car parks.*
- *CCTV monitoring is in place in some parking areas*
- *Only use relevant spaces (i.e., do not park on hatched areas, in disabled parking spaces or other such areas unless you are authorised to do so).*
- *No parking next to electric car stations unless your car is electric or a hybrid and needs to use them.*
- *Reverse Park only on site, except for electric cars where the charging point on the vehicle is positioned where it is impossible to charge it in a reverse-parked position.*
- *Access points are secured with manned guarding, and security officers are afforded discretion on questioning the need to attend site and advise of any parking restrictions that may be in effect on particular dates or times.*
- *It is expected that nobody parks in the hatched areas outside block 5, or any other places marked in such a fashion. Failure to comply will result in disciplinary or other action being taken.*
- *Consider how where you are parking may affect the ability of persons to access/egress a building, remove waste in time for collections or inhibit the response of emergency services attending site.*

PPE/RPE, Face Fit /testing

With exposure to risk being something we wish to reduce so far as is possible, BRE take the recent advent of face-fit testing seriously with a view to protecting health and enhancing the quality of life of those working on behalf of the organisation. To this end, BRE seek to ensure that:

- *Risk assessments should identify the correct type of PPE/RPE required for task-related safety workwear, and anything required for additional purposes such as the potential exposure to hazardous substances or materials.*
- *That PPE/RPE identified as necessary in the risk assessments is available and ergonomically suitable.*
- *Those undertaking the assessments are able to take into account factors that affect the decision made as to the most suitable type of PPE/RPE and justify their decision.*
- *In-house face fit testing to be provided **for all non-Covid face coverings**.*
- *Only competent, trained persons to use more complex masks, particularly those with specialist components and require filter changes and other such maintenance/upkeep.*
- *Appropriate information, instruction, training and supervision supplied.*
- *Manufacturers' literature to be available and consulted in regards any issues that may arise.*
- *Repairs only to be undertaken by those competent to do so.*
- *If in doubt as to whether the masks selected is suitable for a task, speak to a line manager who can investigate the query or escalate the query where they lack the ability to answer the query. Work will not be undertaken until the query is resolved.*
- *Some parties with breathing difficulties or conditions such as asthma may need specialist assistance with masks or be excused from activities that require the wearing of masks so as not to trigger their conditions.*
- *All PPE/RPE complies with the PPE Regs, and bears the required marks for quality assurance.*
- *PPE/RPE is purchased only through approved suppliers and specialist merchants.*

Procurement

BRE seek to procure high quality resources, PPE/RPE, equipment and other items from suppliers that meets, or, preferably, exceeds the expectations of the law and good practice. Procurement procedures including vetting of suppliers takes place to establish the highest quality, safest suppliers for all acquired items for health and safety



management and environmental protection. The ethos of procurement processes given effect is to improve the overall quality and effectiveness of controls, reduce exposure to risk and ensure fitness for purpose of items purchased.

- *PPE/RPE is purchased only through approved suppliers and specialist merchants.*
- *An approved suppliers list is available and only uses those who have met qualifying criteria.*
- *Lead times for the provision of health and safety supplies and resources are reduced to a minimum through fruitful relationships with approved suppliers.*
- *Procurement is not based on competitive tender, so as to ensure quality, durability and suitability of products on the market, rather than simply the cheapest bid received.*
- *Specific works such as construction work will be put out to tender, and quotes reviewed with safety, health and environmental protection considered as integrated works, not separate from it.*

Project Management

To improve the quality and efficiency of projects, and enable them to provide value for money, internal project managers are present to make sure activities within projects are suitably managed to conclusion. These are sometimes complex roles dealing with a number of projects and require all parties who may be impacted to have a voice within the company, so as to ensure that projects are not pushed through without consideration of their effects on others.

- *Project managers are trained, experienced, competent professional persons with a diverse and supportive background that make them suitable for projects we undertake on site.*
- *Familiarity with CDM2015/other relevant legislation is a required element of competency.*
- *Health and safety groups, forums and union liaison are mechanisms for communication of upcoming projects, and arrangements made to avoid interference with other activities on site to the fullest extent possible, and where this cannot be reasonably achieved, facilitation of alternative arrangements to ensure works are completed with minimum interruption to others.*
- *Support is available from Estates and EHS compliance to help project managers work within BRE needs and expectations.*
- *Specific works such as construction work will be put out to tender, and quotes reviewed with safety, health and environmental protection considered as integrated works, not separate from it.*
- *Projects are managed with backing and support from Estates and other areas of the business where this becomes necessary.*
- *Resource efficiency is a significant area for project management consideration to ensure lowering of aspects and impacts on the environment, as well as managing costs.*
- *All projects to consider environmental aspects, including the potential impact on any endangered species, waste management, storage, collection and disposal, management of hazardous substances and materials, and other elements of activities that could pose a risk to environmental concerns.*

Pressure Vessels

Risks posed by faulty/defective pressure vessels are significant and BRE undertakes to ensure their safe operation, maintenance and upgrade without exception. This is achieved through:

- *Benchmarking logs and maintenance records being readily available.*
- *Insurance inspections and remedial works undertaken as needed, approved by the Estates team.*
- *On site teams include competent persons to deal with issues arising from pressure vessels.*
- *Estates compliance monitor and archive 'compliance' paperwork and visits through a compliance tracker, ensuring that there is documented evidence of ensuring safe operation of pressure vessels.*
- *Written schemes of examination available.*
- *Maintenance teams routinely inspect pressure vessels with a view to reporting faults and/or abnormalities.*

PUWER & LOLER

Compliance with the legal and BRE requirements of work with workplace equipment, particularly those items that carry significant risk, is something BRE are keen to ensure. A significant number of workplace deaths each year in the UK are down to staff using equipment they are not competent to use, using it with poor judgement or a lack of PPE/without being clipped on, without understanding the content of the risk assessment, removing critical safety controls or taking shortcuts. BRE seek to ensure that this does not occur within our business, and seeks to ensure this through:



- *Full compliance with the requirements of both PUWER and LOLER as its provisions may be applied to activities undertaken by BRE.*
- *All equipment and activities to be fully risk assessed, and staff must be familiar with and understand the risk assessments to which they are signing on.*
- *All risk assessments to be reinforced with method statements and permits-to-work where tasks/activities are considered complex or inherently dangerous.*
- *Only competent, trained persons to operate equipment to which PUWER and LOLER apply, particularly those with specialist components.*
- *Staff must never attempt to defeat controls/safeguards implemented for their protection or the protection of others.*
- *Appropriate information, instruction, training and supervision supplied.*
- *Manufacturers' literature to be available and consulted in regards any issues that may arise.*
- *Repairs only to be undertaken by those competent to do so.*
- *Any necessary PPE/RPE required to undertake tasks to which LOLER or PUWER may apply to be provided by BRE as part of the operatives safe working practices.*
- *Never take shortcuts to save time on work activities with any piece of equipment, no matter how benign the risks may appear to be.*
- *Lifting operations to be managed by a competent person and a competent banksman, utilising the correct form of lifting equipment for the task being undertaken.*
- *PUWER refers to all equipment used by the organisation in the execution of its activities, including research.*
- *Operatives shall hold the correct competency certificates, cards, licences and other such paperwork to evidence that they are competent to operate specific machinery.*
- *It is the expectation that operatives NEVER operate workplace machinery, equipment or other such devices where they are not trained, competent or supervised (in the case of learners).*
- *Significant findings of the risk assessment/SSW are to be communicated, along with the controls put in place so staff are less likely to defeat safety devices.*
- *Lifting operations must be properly managed, supervised and carried out without risk to health and safety.*
- *Lifting plans are required for complex lifts, particularly where there is a human/work at height element accompanying the lift and placement of items.*
- *Segregation of persons from work activities is the preferred option to eliminate risk from lifting operations.*
- *Supervisors/banksmen have authority to suspend operations where problems are perceived which may lead to a loss event. Suspension of operations must be reported through chain of command.*
- *Supervisors and managers should ensure that content of the SSW documents is understood (risk assessment, policy, method statement and permit to work), and may use any tools/techniques available to check understanding, particularly if they suspect anyone may not fully understand what is expected of them.*

Radiation

One of the least understood risks on site is that of radiation. Whilst alpha and x-radiation are present on site, they are in the form of sealed sources which pose little risk, particularly to the competent persons who are using them in the course of their work. It is BRE's policy to keep the risk as minimal as possible, and we aim to achieve this through:

- *Training undertaken for parties who have duties under relevant statutory provision, to supervisory level.*
- *Safe System of Work produced and uploaded to SharePoint "Working Safely With Ionising Radiation"*
- *Risk assessments produced, supported, where relevant with method statements and permits to work.*
- *Retained RPA available to BRE from Public Health England, contactable via Estates.*
- *Register of sources of radiation on site kept updated.*
- *Relevant awareness training available via the Skillsoft LMS for those working with/around radiation, however, not in a supervisory or management capacity.*
- *Lab teams include radiation safety experts, and have staff trained to RPS level.*
- *BRE are actively reducing the number of radiation sources on site to minimise the risk across site.*
- *Storage of sources is now to be minimised to the minimum store time permissible under law and good practice.*
- *Minimising the number of radiation sources on site to well below levels that can be considered dangerous.*



Title: Health, Safety & Environmental Management

Date: 18 October 2022

Document No: XA10

Revision: 2.0

- *Hiring sources (equipment) for specific periods, rather than keeping them permanently on site, particularly where they may not be used for a substantial period of time, or otherwise potentially suffer wear-and-tear from excessive use.*
- *Noted procedures and safe systems of work are in place, and sufficient for tasks undertaken.*
- *Warning signs to be erected to warn of hazards.*
- *Monitoring systems in place within the laboratory infrastructure.*

Record Keeping & Document Control

It is critical to the ISO9001, 14001 and 45001 management systems that documentation is controlled, and that everyone is able to work from the same documents and is able to locate them in the shared drive and Share Point. Key documentation can be cross-referenced in the document register to ensure that you are working from the correct version or revision of a particular document. These systems are constantly under review and improvements in quality control features on documentation are subject to change:

- *BRE are keeping tight controls on the keeping of statutory records and that which evidence intent to comply.*
- *Contractor records directly uploaded to the new QUBE system.*
- *Document codes are derived from the QMS, to link health and safety document to quality standards which uniform and keep relevant suitable documents for the management of health and safety appropriate to the needs and expectations of the company.*
- *EHS Compliance are reviewing with relevant departments, document registers and associated document characteristics to ensure that documents are not missed, kept up to date, and that no secondary versions of paperwork have been created, particularly without authorisation.*
- *Internal audits are undertaken 6-monthly to ensure compliance with statutory obligations, ISO and UKAS standards.*
- *External audits are undertaken 6-monthly to ensure compliance with statutory obligations, ISO and UKAS standards.*
- *A new head of audit and risk management has been recruited in part, to ensure that processes, procedures and documentation are operating sufficiently and that compliance with relevant statutory provisions and various applicable standards is achieved.*
- *Processes are defined for the deletion and destruction of documents, including confidential waste.*

Research & Development

Research and development is a core element of BRE activities, and there are inherent dangers associated with many such activities. All prudent measures are taken to ensure that risks associated with research and development are controls, including:

- *Labs and equipment are built to rigorous British and European engineering standards.*
- *Staff in the labs are verified experts in their fields*
- *Risk assessments are undertaken for all laboratory equipment, tools, instruments, research and development activities, including when testing to destruction.*
- *Complex/inherently dangerous processes and tasks to be reinforced with method statements and permits-to-work.*
- *Only competent, trained persons to operate, repair or undertake such activities with lab equipment.*
- *Appropriate information, instruction, training and supervision supplied.*
- *Manufacturers' literature to be available and consulted in regards any issues that may arise.*
- *Repairs only to be undertaken by those competent to do so.*
- *An environmental aspect and impacts assessment is to be undertaken to understand the impact of the activities.*
- *Feasibility studies and cost-benefit analysis is undertaken to justify the use of environmental technologies to determine if there is a genuine reason for adopting specific practices when undertaking research and development activities.*
- *Laboratory managers are responsible for operations within their defined remit.*
- *Estates to provide necessary support to ensure safety is properly managed.*

RIDDOR

Under RIDDOR, specific types of accident, incident, near-miss, dangerous occurrences and occupational ill-health (including Covid-19), have to be reported by BRE's Senior Management to the HSE. For the avoidance of doubt, all



RIDDOR events shall be reported to Estates in the first instance, who then shall investigate and appropriately escalate reports of such incidents to Senior Management, who shall then contact the HSE once the facts of the event are known to the fullest extent possible.

- *Senior Management to report any RIDDOR-reportable events subsequent to conducting an accident or incident investigation.*
- *All parties involved within an investigation, including witnesses, are expected to cooperate fully with internal investigations, and external investigations with the Police, HSE, Environment Agency or other investigative or enforcement authority.*
- *Senior Management, Estates and Line Management structure are familiar with RIDDOR processes and how it impacts on their job roles.*
- *Internet availability on site for the submission of F2508 forms, within 2 working weeks of the incident, without fail.*

Risk Assessment/Safe Systems Of Work

Risk assessments are legal requirements under many different pieces of safety, health and environmental management legislation. They are the mechanism under which risks are identified, evaluated and controlled in conjunction with the company's HS&E policy. They are legal documents and signing onto them (as well as method statements and permits to work) constitutes stating that you, as an employee, have read and understood them, and understand what is expected of you regard the works to be undertaken. It is important that staff understand that signing onto legal documents means that they can be produced as evidence in court in the event of an accident or similar event and can form part of a disciplinary process where staff have not been working to a prescribed methodology or have been trying to defeat safeguards.

- *Risk assessments are undertaken for all tasks, equipment, and areas where there is a significant risk attached. Complex tasks are reinforced with a method statement. Inherently dangerous tasks are reinforced with a permit-to-work.*
- *2 yearly reviews are conducted of all risk assessments/method statements*
- *It is expected that staff only sign onto risk assessments and method statements when they are confident they understand what is required.*
- *Estates conduct a 5-yearly review of all risk assessments, permits and other elements of the SSW.*
- *Unless otherwise stated for specific activities, the methodology for risk assessments is based on that described in the HSE Guidance Document HSG163 (Rev4).*
- *Vulnerable persons' risk assessments and associated information are produced in conjunction with HR personnel.*
- *Only competent persons to undertake risk assessments and method statements, particularly for niche specialisms (fire risk assessments, DSEAR, COSHH, etc)*
- *Permits-to-work to be issued solely by the Estates Team.*
- *Risk assessments are being converted into a new, Microsoft Word template, to make them easier to read, update and follow.*
- *Risk assessments also undertaken for assessment of environmental aspects and impacts, in conjunction with the Town and Country Planning Act 1991.*
- *Radiation safety risk assessments produced in accordance with relevant statutory provisions, and advice taken from Public Health England, who act as our advisor in this capacity.*

Roads

Management of roads around site is a priority and significant planning has gone into making the site as traffic friendly as possible, with stretches of road recently repaired and some temporary repairs made in key areas whilst resurfacing in some areas is soon to be made-good. It is important that roads are maintained for access for deliveries and staff, tenant and visitor vehicles.

Damage to vehicles and muscular or jarring injuries to people from potholes is not seen as acceptable and Senior Management have moved to address this concern in ongoing fashion. Damage to vehicles (even minor damage, such as excess wear and tear on tyres from potholes and rough surfacing) can also make vehicles less environmentally friendly, so the regime put in place to manage roads and defects in surfaces addresses a number of concerns throughout the business.

This facet of business management is reinforced by:

- *A new regime to manage the state of road on site, including the doing away with potholes.*
- *Warning signs to be erected to warn of hazards/unsafe conditions.*
- *Roads are now routinely monitored by Estates for wear-and-tear.*



- *Speed limits are being more rigorously enforced, and those caught speeding may be subject to disciplinary or other action.*
- *Where standing water is becoming an issue, we rely on reporting to occur so that this hazard can be eliminated, particularly where a build-up of leaves or similar is the cause in adverse weather.*
- *Signage to be erected where hazards are found to be present.*

Routine, Non-Routine & Emergency Maintenance

Keeping a site this size running requires a suitable and well managed maintenance schedule, and provision for emergency maintenance. BRE have implemented a suitable regime to manage the site in regards routine, non-routine and emergency maintenance:

- *Maintenance is undertaken by contractors and by on-site teams where competent to undertake work.*
- *All contractors are sourced from an approved list, except in emergency situations where a current check is not available.*
- *Those applying for consideration on the approved suppliers/contractors list*
- *Only competent persons with proven experience to be considered for such work.*
- *Checks on quality of workmanship are undertaken, and paperwork updated in Estates to reflect changes.*
- *Segregation of works areas required and compliance with all requirements of CDM as many apply, particularly Part 4 of CDM2015.*
- *Screens to be erected wherever possible.*
- *Warning signs to be erected to warn of hazards.*

Safety Signs & Signals

Where required, signs, signals and other means of providing information shall be erected to warn of hazards and associated risks. To ensure that safety signs and signals are sufficiently erected, all facets of the business including one-off and project activities are risk assessed, and significant findings acted upon:

- *All signs and signals comply with the requirements of the Health and Safety (Signs and Signals) Regulations 1996 and relevant amendments.*
- *Signage is regularly inspected and replaced where deterioration is noticed.*
- *General safety awareness training includes a section on signage types.*

Security & Cleaning

Security and cleaning contractors are mandated to ensure that all their activities establish and maintain the standards that are required for the management of health, safety and wellbeing. This includes access control and Covid-19 monitoring as it applies to the remit of their roles. The role of security and cleaning contractors is a critical element of our strategy to maintain health and general wellbeing, and this is achieved by:

- *External contractors (given specific mandates) fulfilling specific roles.*
- *Contractors to be familiarised and regularly refresh their understanding of HS&E procedures, including Emergency procedures, and their role within those procedures.*
- *Access monitoring to site and keyholding duties are assigned to limit access to dangerous areas of the site.*
- *100% Covid-19 temperature monitoring taking place at the gate with temperature guns.*
- *Regular meetings with the contractors' Senior Management to evaluate performance and areas for improvement.*

Sickness & Absence

Sickness and absence reporting is a critical tool in tracking the causes and consequences of hazards not being controlled where sickness and absence is work-related. Procedures have been put in place to report sickness and absence, and for it to be monitored, and tracked, to ensure that performance can be appropriately measured, and improvements noted. In conjunction with Covid-19 policies and procedures, this will be achieved by means of:

- *Standard operating procedure produced for notifying the organisation of sickness absences and other absences.*
- *Staff are to ensure they do not come to work during communicable phases of their sicknesses where they are likely to cause contamination of the staff community as a whole.*
- *Risk assessment produced.*
- *Work from home requirement for all those who can undertake work at home.*



Title: Health, Safety & Environmental Management

Date: 18 October 2022

Document No: XA10

Revision: 2.0

- *No journeys approved which are not essential working journeys.*
- *Sickness and absence stats and key information tracked to identify any causes that can be eliminated.*

Slips, Trips & Falls

Responsible for around 40% of workplace injuries, BRE seek to ensure that slips, trips and falls on the level are properly managed in line with statutory, organisational and best practice expectations. BRE have given effect to the following to minimise, and preferably eliminate, slips, trips and falls:

- *Staff are expected to wear footwear appropriate to their work environment*
- *Reporting systems in place to report spillages, slippery floors, defects in flooring and any other slip, trip or fall hazards.*
- *Warning signs available in all areas of the site to warn of spillages and other hazards in walkways.*
- *Estates are authorised to close/cordon off areas where there is a risk of repeat incidents or injuries.*
- *It is expected of staff to wipe their feet on mats, so as to avoid treading water around site during adverse weather.*
- *Slip resistance designed into all floor renewals and identified hazardous slippery floors.*
- *Cleaning solutions sourced by contractors are to be suitable for the floor surfaces.*

SSSI (Site of Special Scientific Interest)

Sites of special scientific interest near the site are to be considered in regards activities on site that could affect them. As such, compliance and S-Plan are concerned with the control of hazards that could be realised in connection with BRE's acts and omissions, and seek to control them to prevent damage to SSSI's through the following means:

- *Awareness of the aspects of the business that could have an impact on local SSSIs.*
- *BRE are not considered to be an SSSI., however, BRE's Watford campus is located next to Bricket Wood Common, which is an SSSI.*
- *Any conditions or restrictions imposed on the site due to its proximity to the SSSI are fully complied with.*
- *We work closely with special interest and industry bodies, as well as trades unions and local authorities, to ensure all legal and other requirements are met.*
- *Consents are sought and opinions canvassed for any activities which may have a scientific or environmental impact on the locality or region.*
- *Strict policy of non-interference with plant or animal life, water courses or any other aspect of the natural environment.*

Storage & Racking

In order to prevent harm from collapse or dislodging of elements of racking, specific controls have been implemented, including periodic checks performed by a specialist engineering company. Storage practices are expected to be in keeping with good practice and mitigate fire and other risks as a result of poor storage procedures:

- *Good storage practices are expected of all staff (heavier materials closer to the ground, no overloading the capacity of the structures, storage of dangerous materials to be specialised, etc)*
- *COSHH/DSEAR assessments/SDS available for all stored substances and/or materials which are known or suspected to be hazardous.*
- *Racking examined by a specialist engineering company periodically.*
- *Defects reporting procedures in place*
- *COSHH Cupboards present on site*
- *Hazardous substances stored where leaks will emit to air rather than remaining trapped and creating explosive atmospheres.*
- *Access restricted to only those who need to access substances or materials.*
- *Where access requires use of a forklift or similar plant, only trained, competent persons will be permitted to use such plant to access stored substances/materials.*

Supervision

To ensure competence, and upskilling/mentoring opportunities are maximised for those less experienced/capable of doing the job, suitable levels of supervision are to be allocated to individuals according to their needs. This will be formally logged to evidence that supervision levels have been 'adequate' to the needs of the individual and the task(s) they are being asked to perform. This will also be ensured by means of:

- *Supervisors to be suitably competent and experienced, and able to impart knowledge to others.*



- *Supervision level to be proportionate to the level of risk, and the competence/experience level of the staff concerned.*
- *Supervisors urged not to use a 'one size fits all' approach to supervision, teaching and mentoring techniques.*
- *Supervisors authorised to shut down operations where risk becomes too great, or where there is clearly a need for further information, instruction and training of the operator(s) before works may continue.*

Thermal Comfort/Workplace Temperature

Ensuring a suitable temperature between 13 degrees and 16 degrees wherever possible is something BRE are committed to for the pursuit of thermal comfort and management of health and wellbeing of staff and others. Whilst it must be acknowledged this will not always be possible, particularly with older buildings and when working outside, BRE aims to ensure, so far as is practicable, that this is achieved.

- *A common sense approach to workplace temperature, with a minimum temperature of 16 degrees recommended for offices and 13 degrees for labour works.*
- *Use of air conditioning and radiators as necessary, whilst also attempting to conserve energy in vacant areas of the site wherever possible.*
- *EPCs to be reviewed periodically and a review of how thermal comfort can be maintained.*
- *Appropriate weather protection clothing supplied to outdoor workers for maintaining health and wellbeing of staff in adverse weather conditions.*
- *Kitchens available throughout site with tea and coffee making facilities and potable hot and cold-water supplies.*
- *Windows and doors to be opened to manage air flow through premises wherever possible.*
- *Use of common sense in the use of breaks, and any authorised extra breaks where thermal comfort proves largely impossible (i.e., if working outside in extremes of temperature and adverse weather conditions).*

Trade Effluent

It must be ensured that trade effluent is kept in check and as part of the S-Plan, monitoring of trade effluent is undertaken where it is identified as being present. BRE seek to identify effluent types and quantities, and ensure that they do not cause damage to the environment, and this is achieved by:

- *Trade effluent sampling undertaken periodically by Thames Water (although presently, Covid-19 rules imposed by Thames Water have stopped site visits)*
- *Estates and relevant building managers are aware of their trade effluent creation and monitor this accordingly.*
- *Interim external consultant is being used to sample trade effluent in the absence of Thames Water.*
- *All sampling activities to be risk assessed, include a method statement and be undertaken only under the authority of a permit to work.*
- *Said works may only be undertaken by competent persons, who have received adequate information, instruction and training.*
- *Trade effluent types to be identified for auditing purposes and if necessary, data sheets produced by BRE to provide information, instruction and training for those who work with or in close proximity to said effluents or their sources, or activities producing them.*

Trade Union & Other Reps

Ensuring everyone has a voice at BRE in regard to their health, safety and wellbeing is a priority for Senior Management, so as to ensure fairness, openness/transparency, and compliance as a minimum. Communication with representatives of varying types provides a 'checks and balances' approach to managed safety and provides us with suitable, acceptable and effective means to manage safety, health and environmental concerns that have an impact on the quality and sufficiency of the working environment:

- *BRE is committed to fairness and correctness in its HS&E decisions, and endorses union feedback and guidance to make the organisation internationally renowned as a safe and responsible place to work*
- *Trade unions and other representatives are welcomed to speak in any relevant forums or groups they wish to sit in on. Their comments will be minuted within specific forums.*
- *Trade union and other representatives will be offered any reasonable support they need to execute their duties under relevant statutory provisions.*



Title: Health, Safety & Environmental Management

Date: 18 October 2022

Document No: XA10

Revision: 2.0

- *BRE shall seek guidance from trades unions and other such sources where it is reasonable to do so, particularly where guidance is sporadic in other areas.*

Training, Competence, Information & Instruction

BRE is unable to operate without the recruitment of competent persons and the development of its personnel. As such, the following systems, processes and controls have been given effect to ensure that all staff have the relevant training, qualifications, skills, knowledge base and other characteristics to be considered competent to undertake their role:

- *BRE have invested in several platforms over the last few years and have now established an LMS with Skillssoft to cover all safety, health and environmental management training.*
- *Approximately 6 mandatory training units are required for completion within 30 days of issue, which must be refreshed annually. Other units which are not mandatory, may be taken within 90 days of issue, and refreshed two-yearly.*
- *Job descriptions and job analysis undertaken to devise the correct remit of jobs within BRE which require specific qualifications, knowledge, skills and experience.*
- *Provision of an induction and any work-related training as is necessary for the role being undertaken shall be provided by BRE.*
- *As the nature of the workplace, or particular risks change, information, instruction and training shall be provided where needed, including review and any necessary development of the risk assessments or overall safe system of work.*
- *BRE provide ongoing information, instruction, training and supervision as necessary.*
- *Competent persons training has been removed from the training provided by BRE, due to the fact that other training available can take its place, and upskilling/mentoring schemes are in the pipeline for those being upskilled to the level of 'competent persons'.*
- *Staff are encouraged to come forward and suggest training that may be of use to them in their role, that it may be considered.*
- *Training that cannot be provided online (such as confined spaces entry, forklift truck driver training, face-fit training, and other such training) is delivered by competent specialists.*
- *Corporate Use Policy governs the use of the LMS and is held in line with existing relevant policies governing IT, Data Protection, Fair Use and other relevant factors.*
- *Adequate information, instruction, training and supervision provided.*

Senior Management Review

During regular meetings, reviews of specific topics required by Senior Management clauses in ISO systems given effect are included in the agenda of rolling meetings to complete a review for all three systems annually:

- *Management reviews booked monthly with rolling content relevant to all 3 ISO systems (9/14/45001).*
- *This content is auditable and subject to ISO and UKAS audits*
- *Senior Management (Director Level) accountability for specific areas of operation is established.*

Use Of Kitchens At Work

Kitchens are available for use by staff on site, but for the maintenance of safety, health and environmental concerns, the following has been given effect:

- *BRE staff on site may make use of any kitchens made available to them.*
- *No appliances from home or purchased by individuals should be brought in for use.*
- *PAT Test stickers required for items over 12 months old.*
- *Notices in every kitchen regards hot water outlets*
- *Electrical equipment that has exposed wiring or it otherwise found to be unfit for purpose on a pre-use inspection should be removed from circulation, and either repaired or replaced.*
- *Water dispensers cleaned regularly*
- *Waste removal from kitchen bins on a daily basis.*
- *Waste is segregated by type.*
- *Energy efficiency regime being established to avoid lights being on when not in use.*

Use of Mobile Phones

Whilst sometimes inappropriate, mobile phone use may often be necessary on a site this size, particularly when coordinating emergency response or similar, or when trying to minimise time away from work to make a relevant



query from a colleague or superior. BRE take a common sense approach to the use of mobile phones, in that, the organisation have no issue with people using mobile phones on site so long as (a) it can be done safely, (b) it is not distracting you from hazards in proximity to you, and (c) it is expedient. To ensure that use of mobile phones is managed sensibly, and with due regard for safety of yourself and those around you, the following is stipulated:

- *Mobile phone use is permissible in most areas of the site except where there is a specific notice to say otherwise.*
- *First aiders, mental health first aiders and appointed persons are permitted to use mobile phones in any emergency situation at any part of the site due to the nature of their role, except where this may pose an immediate danger.*
- *Use of mobile phones when driving (cars, forklifts, or any other vehicle) is not acceptable unless the vehicle is fitted with a hands-free system. Drivers should park in a safe place if they are going to answer a call.*
- *It is expected that staff use their common sense in determining whether it is safe to answer a call.*

Use Of Tools

Inevitably tools of various types will be used for specific activities. In order to ensure that they are being used properly, safely, and with due regard for the damage they can cause to persons, premises, property and the environment, BRE insist that:

- *Only trained, competent persons to use tools*
- *Pre-operation inspections to be undertake and defects reported/tools removed from circulation for repair or replacement.*
- *Always use the most appropriate tool for the job.*
- *Tools to be stored appropriately and only recharged with the charger packs they are meant to be used with.*
- *Always use the lowest voltage tools possible.*
- *Procedures in place for recording defects, and for the disposal, repair or replacement of tools.*
- *Use of all tools suitably and sufficiently risk assessed*
- *Procedures in place to report, repair or replace defective tools.*
- *Adequate information, instruction, training and supervision required where appropriate, including for learners, and those being introduced to specialist tools/equipment.*
- *Only use in accordance with the manufacturers' instructions and approved good practice.*
- *Wear appropriate PPE/RPE where necessary.*

Utilities & Sustainability

Sustainability is critical to the ability of BRE to survive economic turbulence and develop construction components that have longevity and hold long-term value for the construction industry. Our ability to ensure that utilities are used in such a way as to not harm the environment and minimise cost is also a key element of our financial and sustainability strategy, in that the two are very closely linked, particularly in terms of resource efficiency, and the ability of one to drive the other. As such, to ensure that we utilise our utility use and sustainability plans properly for maximum benefit to the business and the natural environment, BRE seeks to ensure that:

- *Senior Management and S-Plan involvement in highlighting and selecting suitable objectives, targets and associated KPIs for utilities and sustainability, including the establishment and use of useful green technology and techniques for increasing sustainability, and more efficient use of utilities/services on site.*
- *S-Plan authorised to hold Senior Management accountable for setting realistic targets, pertinent to the size, scope and activities of the business.*
- *Use of new technologies and sciences in regards environmental protection, including the consideration of experimental systems where prudent.*
- *Feasibility studies undertaken, to ensure gains in one area are not offset by equal or worse losses in another.*
- *Energy saving devices strategically placed within the business premises to be able to reduce energy consumption, heat loss, etc, and a long-term strategy to extend this to all areas of the site over time.*

Vehicular Movement On Site

Anybody who drives on site as part of their work is exposed to a number of additional dangers and not all of them are reasonably foreseeable. As such, we have opted to train, and put in place procedures to ensure that drivers, particularly those driving in winter or other adverse conditions, are as protected as can be achieved in the



circumstances. To this end, BRE have implemented the following arrangements to ensure driving as part of your work is a practice that is properly managed:

- *Observe 15mph speed limit*
- *Observe all parking restrictions, including not parking on hatched markings.*
- *Reverse parking policy*
- *Vehicles are subject to visual pre-op inspection and a checklist is to be submitted to health and safety for the purpose of due diligence record keeping.*
- *At all times, drivers are to be free of the influence of drugs or alcohol.*
- *Random drug and alcohol tests may be undertaken with no notice, for anyone taking a work-related journey, and for those suspected of being under the influence whilst at work.*
- *Ensure you have appropriate insurance for the journeys/work you do, and the correct licence for the type of vehicle you are driving.*
- *Valid licence for the vehicle(s) being driven is required as part of a BRE due diligence check. Licences will be checked by line managers in accordance with due diligence protocol. This will also ensure that we can catch anyone who might need to drive, who has had their licence revoked or suspended*
- *At the present time, it is noted that there are potholes and other defects in road surfaces. A regime is currently being worked on to make road surfaces good.*
- *Warning signs to be erected to warn of hazards in areas where plant/equipment may be moving around.*

Vibration

Vibration can be an under-estimated hazard which is capable of causing serious harm, as such, BRE have implemented the following measures that we believe should mitigate the risk of harm from vibration, be it from tools or other sources:

- *All tasks that create vibration have been risk assessed.*
- *Appropriate information, instruction, training and supervision provided.*
- *Only competent persons are permitted to undertake works.*
- *It shall be identified as to the magnitude of the vibrations, and the appropriate maximum daily trigger time permissible in each instance.*
- *Anti-vibration gloves with liquid packs are not recommended for use. Case studies have now found that they actually increase the likelihood of bodily damage caused by vibration.*
- *Young and vulnerable persons shall not be permitted to use tools that cause significant vibration, particularly if they have existing issues with nerve damage or other medical problems which could make them more vulnerable to the effects of vibration.*
- *Job rotation and extra breaks will be scheduled when using vibrating tools that produce significant levels of vibration.*
- *Line managers of those using vibrating tools/equipment are to check the hands of employees regularly for possible signs of HAVS and question staff about symptoms of WBV.*
- *Awareness literature and online training provided.*

Vulnerable Persons

All persons will be assessed for the ability to undertake work tasks, particularly those who are considered to be especially vulnerable, either under equality laws or under employer discretion for safeguarding those who may be vulnerable. It is our ethos to ensure that those with vulnerabilities are afforded additional protection in the execution of their duties, and this is achieved by mean of:

- *All vulnerable persons being identified in line with the Equality Act 2010, and through mechanisms that are part of the onboarding process. Needs and expectations are accordingly addressed.*
- *Activities shall incorporate controls to protect vulnerable persons within the risk assessment and SSoW.*
- *PEEPs and other such measures are fully thought out to ensure that vulnerable persons can be evacuated in any emergency scenario.*
- *Young persons (or, conversely, older persons) who are particularly vulnerable in regards certain activities will either be excluded from specific working activities if they cannot be sufficiently protected, or provided with appropriate information, instruction, training, supervision and extra controls to make safe activities they are to undertake.*
- *Any workplace activities we need to exclude staff from (where those activities cannot be made safe for them to undertake) shall be discussed with the staff member concerned, and after taking advice from union/other representatives and specialists in the field.*



- *BRE expect that no vulnerable person, or person with protected characteristics, be discriminated against, but likewise, also expect that no such person be put unnecessarily in harm's way.*
- *Line Managers shall have access to advice in regard to how to manage vulnerable persons in line with this policy and expectation, and in line with the law, as the balance between protection and unwitting discrimination can sometimes be a fine one.*

Waste Management

Waste management is a significant area of concern to our sustainability drive and to our overarching Environmental Management System. We aim to reduce, re-use and recycle as much waste as possible, and put all waste to additional uses wherever suitable uses can be identified, in order to ensure we minimise waste and pollution, and set an example for excellence within the industry. In order to achieve this, we have implemented the following:

- *Contractors come to site to remove waste.*
- *Waste segregation by type is expected wherever possible*
- *Waste quantities are to be continually measured by S-Plan as part of the objectives/targets, including hazardous and other waste types, such as waste from 'testing to destruction'.*
- *Recycling and reusing campaigns in effect, along with appropriate awareness literature, environmental awareness training through BRE's new online LMS, and making appropriate information, instruction, and training available.*
- *Pre-arranged access for contractors, who observe detailed RAMS for activities being undertaken.*
- *All necessary PPE/RPE is provided where necessary.*
- *Items stored before going to waste have specific disposal procedures.*
- *Waste management plan is in effect/monitored by S-Plan in conjunction with objectives and KPIs.*
- *Contractors who collect waste will be expected to ensure excellence in the disposal of waste, including muck-away for spillages and utilising reporting procedures for any spillage or incident that may be likely to cause harm to flora or fauna, persons, premises or cause entry of waste into a water course which may pollute or breach permits/consents.*

Water Quality/Legionella

Water quality is an essential aspect of the workplace and natural environment on site. In order to ensure that water quality is meeting, or better yet, exceeding, regional, industry sector and national standards:

- *A specialist water quality contractor is brought in to manage water quality on site.*
- *Visits/documentation logged within the Envoy to ensure compliance audit trails for water quality exist.*
- *Specialist contractor reports unsafe conditions that may lead to the presence of legionella, and flushes all water systems through, including little-used outlets.*
- *Temperature tests on hot water/boiler systems.*
- *Insurance examinations performed on boilers/pressure vessels.*
- *Process for reported suspected water contamination or drop in water quality on site.*
- *Sampling undertaken where necessary*
- *Periodic checks done on water systems in all buildings.*

Welfare Facilities

BRE consider it unacceptable for welfare facilities to fall below the standards required of the Workplace (Health, Safety and Welfare) Regulations 1992, and for risks to health and wellbeing not to be managed in accordance with the Management of Health and Safety at Work Regulations 1999. Additionally, in regards CDM projects, BRE require all facilities available be maintained to at least the standard set down in the Construction (Design and Management) Regulations 2015 (Schedule 2). To this end, the following is stipulated:

- *BRE have kitchenettes, rest areas people can go away from their workspaces and toilets provided in sufficient quantities around the site.*
- *All statutory requirements of the Workplace (Health, Safety and Welfare) Regulations 1992, and the Management of Health and Safety at Work Regulations 1999 are observed.*
- *Cleaning and restocking of toilets takes place daily throughout the site.*
- *Reporting processes are in place for reporting welfare facilities left in substandard condition.*
- *Welfare facilities are monitored through workplace audit and inspection, and due diligence surveys.*



Whistleblowing

Staff are encouraged to use the chain of command to resolve issues, however, should this route not provide a satisfactory resolution to a breach or dangerous situation, there is a process in place to enforce remedial action, including whistleblowing to enforcement agencies:

- *Those who have exhausted internal channels to bring to attention of management a health, safety, environmental or general wellbeing issue or breach, may utilise the company's whistleblowing policy so long as they (a) can evidence they have exhausted the chain of command (b) believe there is a breach or issue that, if unresolved, could do harm to the business, (c) have a genuine belief of this.*
- *Appropriate authorities that may be contacted in the first instance are the HSE (for health and safety issues/breaches), and the Environment Agency (for environmental breaches/issue).*
- *Those who do 'whistle blow' will be protected from any disciplinary action and not subject to any sanctions if all three of the conditions in paragraph 1 are satisfied.*
- *Senior Management acknowledge that whistleblowing has its place, however, it is a last resort. Senior Management, and management at all levels, therefore have an open-door policy on presenting issues and possible breaches, which must be dealt with and documented.*

Work At Height

Work at height activities are inherently dangerous and cause more workplace fatalities annually than any other activity, particularly in the construction sector. BRE seek to ensure that no significant injuries or fatalities occur as a result of work at height activities. To this end, work at height activities will be managed in the following way:

- *Work at height activities to be risk assessed and reinforced by method statements and permits to work.*
- *Only competent, trained persons may undertake work at height operations. Where specific equipment requires IPAF or PAZMA training, only people with those credentials may use that equipment.*
- *BRE shall supply all necessary information, instruction, training and supervision required.*
- *Operations must be properly planned, supervised and undertaken without risk to health, safety or life.*
- *Appropriate PPE/fall arrest equipment to be worn at all times (to be identified in the risk assessment)*
- *A banksman shall be present for all work at height activities to report emergency situations, and to operate from the ground, where equipment in the basket has failed or cannot be operated.*
- *When working at height, tools and other items are to be tethered to the wrist (as can be practicably achieved) when in use and secured in such a way as they cannot fall from height when not in use, or in any circumstance.*
- *Means of communication to sound the alarm are permissible, however, they should not be used for any purpose during these operations than to sound the alarm/summon assistance.*
- *Appropriate segregation to be put in place, so as to avoid the possibility of items (tools, etc) being dropped onto persons below.*
- *Warning signs to be erected to warn of hazards.*
- *It is expected that operatives adhere to all information, instruction, training and guidance provided in respect to the use of work at height equipment, including ladders, step ladders, etc.*
- *Pre-operation inspections should be undertaken and check sheets completed as required.*
- *Defective equipment should be reported through established channels.*

Working From Home

With the Covid-19 pandemic causing business models to be restructured, and force businesses to adapt to a 'new normal', including working completely, or predominantly from home. As such, a realisation of workplace risks associated with home working has to be acknowledged, and BRE seek to manage home-working workplace risks in the following way to ensure that staff are protected from harm in a familiar environment that may cause them to become casual towards the harm they can do to themselves, particularly through posture at home-based workstations and in inappropriate, non-ergonomic, non-adjustable chairs. We also acknowledge the extra strain on mental health of staff due to the lack of interaction with others, lack of variety in work setting, and home-life circumstances which can add to the stress of a working life.

- *BRE have had to adjust the working model for day to day working in response to the Covid-19 outbreak, and the company restructuring. This has had a positive safety, health and environmental impact in many ways, reducing the opportunities for work related injuries, and using less energy within the site, however, there is an effective trade-off with use of services and other considerations for working at home. As such, safety, health and environmental concerns will be managed in the following ways:*
- *Information, instruction, and training provided and awareness campaign for safe working at home.*
- *Expectation for the minimisation or preferred elimination of journeys except those critical to operations.*



- *Management of home services to ensure you keep warm/comfortable at home whilst working, but without doing damage to yourself or the environment with excessive service use (remembering the potential for leaks from boilers and gas runs or having heating systems so high that you can become dizzy and unable to perform your work-related tasks.*
- *Adherence to the DSE policy and associated risk assessments.*
- *Ensure adequate breaks are taken to relieve yourself of the stress of working, living and sleeping within the same four walls. Utilise garden spaces wherever possible as well as taking walks. This is a positive strategy to manage your mental, emotional and psychological wellbeing.*
- *Where staff are struggling with their mental, emotional and psychological wellbeing, BRE have available 2 mental health first aiders presently, and they can assist in signposting you to helpful literature, professional help and other such services where required. Where there is a significant struggle in this regard, it may be beneficial to discuss working options with mental health first aiders and management figures. Please do not be shy in looking after your mental wellbeing.*

Working At/From 3rd Party Sites

In the same vein, working at/from 3rd party sites presents its own unique dangers, and the Covid-19 outbreak adds to this. As such, they're a number of controls put into effect to guard against any hazards which may be realised, and the rigidity of controls shall be more significant in relation to the risks presented or perceived by the organisation:

- *Work at/from 3rd party sites prior notified in writing to line management and Head of H&S for approval.*
- *All relevant policies and rules for attendance and work at site must be received in advance and arrange for site inductions to be undertaken.*
- *Staff attending 3rd party sites should make themselves aware in advance of whether there may be emergency drills planned, etc, and familiarise themselves with emergency procedures.*
- *DSE assessments to be undertaken for any temporary workstations being used and submitted electronically to line managers and the Head of Health and Safety.*
- *Staff should be familiarised with all policies, processes and procedures that affect them, including access to relevant risk assessments, method statements and other documentation that provides appropriate levels of information, instruction, and training required for the works being undertaken.*
- *Appropriate supervision to be utilised where required.*
- *If in doubt over the safety of the site, or in doubt over the ability to execute works safely, staff are to contact their line manager to confirm whether works should go ahead or be re-arranged.*
- *All relevant identification, PPE/RPE and protective clothing for outdoor works to be worn in conjunction with the risk assessment and any other requirements.*

Workshops

Workshops can be complex and inherently dangerous, and as such, it is the case that BRE require extra steps to be taken to mitigate the risks posed. As such, this list of control systems has been given effect, although may be added to at the discretion of Senior Management for the mitigation of risks to persons, property, premises and the environment:

- *Full SSW in place, with permits issues by Estates*
- *Adequate, periodically tested, emergency procedure tests in place*
- *Experienced, competent operatives and managers are well aware of their HS&E responsibilities*
- *Appropriate information, instruction, training and supervision provided and further such to be provided where needs arise.*
- *Workshops outfitted and kept to rigorous safety and environmental standards to ensure the highest standards of environmental protection, and health and safety management are achieved.*
- *Fire/emergency provisions put in place in conjunction with fire risk assessment significant findings.*
- *Fire risk assessments currently under review and update across the site.*
- *Specialist contractors maintain all fire safety provisions on behalf of the organisation (extinguishers, alarms, panels, electrical components, etc).*
- *Estates personnel manage/audit workshops as part of their compliance remit*
- *Staff empowered to report dangerous situations which may lead to fire.*
- *Segregation of waste, including separation of fuel and ignition sources, both internally and externally.*
- *Hot works are only to be undertaken by competent persons, with specific controls in place, with risk assessments, method statements and permits-to-work put in place to govern work practices.*
- *Equipment, plant and tools maintained and fit for purpose.*
- *Pre-use inspections undertaken and logged.*
- *Reporting procedures for substandard equipment, plant, tools, and dangerous situations/occurrences.*



Title: Health, Safety & Environmental Management

Date: 18 October 2022

Document No: XA10

Revision: 2.0

- *See PUWER and similar policies for further details on specific items.*

Young People

Young people (those who have not yet attained the age of 18) will be protected by BRE as vulnerable persons. There is a higher duty of care to vulnerable persons including young persons, and BRE seek to move beyond mere compliance to ensure the wellbeing of such groups:

- *Onboarding process includes the extended need for upskilling, mentoring and extra safety provisions.*
- *Risk assessments produced for individual young persons for all of their work-related activities.*
- *Extended information, instruction, mentoring, training and supervision as required.*
- *Regular written updates required periodically by line managers based on the findings of those supervising them and interactions with the young persons concerned.*
- *Estates to be informed of any hazardous activity being undertaken by young people, to ensure compliance with requirements for undertaking hazardous activities.*
- *Young persons required to declare any health condition that may cause health issues whilst at work.*
- *Parents/guardians are to approve risk assessments (and other elements of the safe system of work as necessary) prior to works being undertaken by young people.*



Appendix 1: Framework For Setting Of Objectives

OBJECTIVE-SETTING FRAMEWORK GUIDE

For every period of 12 months, BRE shall set, review and amend the objectives the organisation sets for itself in respect to maintaining a high standard of health and safety management. To this end, the organisation has created a framework of considerations to act as a guide for formulating, setting, reviewing and amending the objectives for any given period. This framework is being set-up in accordance with Clause 5.2 'Occupational Health and Safety Policy' in respect to satisfying this element of the ISO45001 standard. As such, the framework comprises of factors broken down into the following elements:

- *Worker engagement and communication.*
- *Operational factors including enforcement.*
- *Compliance with legislative requirements, other requirements and good practice.*
- *Review of key documents and records.*
- *Epidemiology and identifiable trends.*
- *Achievement of objectives for the current and previous periods.*
- *Concerns noted which require immediate or extreme remedial action.*

This should give the organisation a suitable framework which looks at the company, its ethos and policies, its ability to manage risks in operations, legal compliance, statistical and qualitative data and ability to achieve the policies it sets in order to draw up a 'big picture' of how health and safety management and operational risks are being:

- *Identified*
- *Controlled*
- *Managed*
- *Monitored/Reviewed*
- *Maintained*
- *Improved*

The significant findings of the data analysis should form part of the presentation and report to Directors, along with recommendations for the setting and/or repeal of objectives.

Worker Engagement and Communication:

Keeping worker engagement and communication audit trails is as important as the engagement and communication itself. Keeping audit trails should be an automatic by-product of a good safety, health and environmental management system. The following elements of worker engagement and communication should be kept as part of the audit trail, and data from the engagement and communication integrated into the objective-setting framework, the presentation and report.

- *Copies of training sessions*
- *Training records*
- *Corporate competence**
- *Training matrix (Registers of attendance)*
- *Inductions*
- *Elements of worker engagement and their effectiveness*
- *Record of significant communications in respect to health and safety issues/concerns.*
- *Communications with safety representatives and safety committees as is necessary.*
- *Competence assessments of all staff.*
- *CPD records.*



Operational Factors including Enforcement:

Factors of the organisation's operation that need to be included in the objective-setting framework include anything critical to the measurement of performance in safety, health and environmental management. This will include use of resources including human resources, re-examining the context of the organisation and examination of any enforcement taken against the organisation. Examination of management of change systems, mitigating circumstances and accreditation retention are also good KPIs to be considered. For purposes of the EMS & OH&SMS, review of the following KPIs is the minimum to be examined:

- *Company hours spent on health and safety matters (including hours in particular roles, training, etc).*
- *Health and safety coordinator hours broken down (general H&S, CDM, training, H&S culture, CPD).*
- *Review of the occupational health and safety management system including gap analysis.*
- *SSW (Policy, risk assessments, method statements, permit to work).*
- *Enforcement notices received from the HSE, local authorities, fire and rescue service, etc.*
- *Insurance, and other claims made against the organisation.*
- *Positive and negative feedback received from Clients and other parties.*
- *Examination of 'context of the organisation', to determine if any persons not previously considered in context been impacted by the organisation, particularly, in a way that was not previously foreseen?*
- *Examination of the 'management of change' system to examine its effectiveness.*
- *Court appearances and punishments handed down by the legal system.*
- *Mitigating circumstances.*
- *ISO accreditation achieved/retained.*
- *Other accreditations (APS, etc).*
- *Other documents/records that demonstrate control/lack of health and safety within the organisation.*

These factors should be epidemiologically analysed and mitigating circumstances identified and applied. Data from year one should be compared to acceptable industry and legislative safety, health and environmental performance levels for benchmarking purposes, and for the setting of quantifiable acceptable/unacceptable levels of safety, health and environmental performance. This can then be summarised for ease of reference in the Directors' Report and Presentation.

Compliance with Legal and Other Requirements:

In order to measure compliance, not only are audits, gap analysis and other tools employed in the next element of the framework, but also, a register is created to identify the legislation, ACoPs, guidance documents, information leaflets and other documents used to ensure that the organisation is kept up to date and compliant. The status of such documents is monitored in ongoing fashion, and subscriptions to legislators' newsletters (etc) are utilised to stay informed of updates and consultations. The register is then reviewed annually on top of this. It shall be used to keep the organisation legally compliant, and gaps in information identified as soon as practicable. Directors shall be notified up updates in the report, as well as by email prior to these taking effect.

Key Document/Record Review:

The use of key documents and records in creating the framework is critical, as the use of such documents and records with safety-critical data shall provide qualitative data for a volley of elements of the consequences of business operation including sickness and absence monitoring, known instances of presenteeism, accident investigation reports, audits, inspections, management reviews, SSW elements. The minimum data to make up this section of the framework, report and presentation shall include:

- *Sickness and absence records*
- *Known cases of presenteeism and the approximate impact of presenteeism in the workplace.*
- *Accident reports and records (HSG510)*
- *Number of applications for time off*
- *Register of document types and document reviews*
- *Gap analysis*
- *Documents produced*
- *Document control*
- *Reviews (Policy, RAMS)*



Title: Health, Safety & Environmental Management

Date: 18 October 2022

Document No: XA10

Revision: 2.0

- *Number of requests for risk assessments of other elements of health and safety paperwork.*
- *Number of requests for clarification of said health and safety paperwork.*
- *Results of audits, inspections and management reviews*
- *Results of accident investigations, reports, next steps*
- *Performance measurement, calibrations, measurements, etc*
- *Number of RIDDOR incidents or those of like or similar nature*
- *Review of emergency response and preparedness*
- *Previous and current objectives, and whether they have been achieved, etc?*

This information can be used to identify critical trends and make projections based on current attitudes (safety, health and environmental culture) and enable remedial actions to be identified on a case-by-case basis, helping the organisation move through different safety cultures from pathological to pro-active.

Epidemiology & Identifiable Trends:

The organisation will employ an annual epidemiological analysis to provide quantifiable results in a report and presentation to Directors. The data shall be studied against previous' years analysis when data becomes available for this to be done to identify any particular trends in health and safety matters which need to be addressed. In order to achieve this, the following must be done.

- *Epidemiological Analyses' (if conducted).*
- *Analysis of previous epidemiological analysis to identify any particular trends in safety, health and environmental matters that need addressing.*
- *Any qualitative data that may provide explanations for trends, lack of data or other anomalies.*

Achievement of Objectives from Current and Previous Periods:

Whether or not the organisation has hit its current and previous objectives should be a cause for change in the priorities and objectives of the organisation. It is foreseeable the objectives may not be achievable, or that resources may not be readily available to achieve the objectives. If there is a trend of not achieving specific objectives, it must be determined why, and whether the objective needs to be withdrawn. Any withdrawn objectives need to be justified and noted in audits and management reviews as may be necessary.

Concerns Noted which require Immediate or Extreme Remedial Action:

Where concerns are noted which require immediate or extreme remedial action, these are to be recorded in meeting minutes, management reviews, audits and in the eventual annual report, including circumstances and reasons for remedial actions. Details of these remedial actions shall, where relevant, be added to the relevant sections of this framework.

Presentation of the results of the above shall be made to the Directors in the form of an annual safety, health and environmental management report, the findings of which shall be considered as objectives for the following year. It shall be the right of the Directors to use the report to allocate proportionate resources to particular areas of business operations with evidence-based decision-making. The Directors shall also have the right to withdraw objectives should the report consider that:

- *The business is not ready to, or capable of, living up to a target that has been set.*
- *The business is being prevented from achieving an objective by mitigating circumstances, that are beyond its control, particularly those which do not have a foreseeable end in sight.*
- *If resources cannot be acquired to make achieving the objectives possible/feasible.*
- *There are now more pressing issues requiring attention (prioritisation of greater risks, etc).*

The report shall detail all relevant information from all 7 S-Plan areas to be examined within the framework, including sub-requirements of the sections. All sections shall contain quantitative information, with a reasonable detail of qualitative information and information on mitigating factors.

The parties responsible for detailing the framework, presentation and report shall be given access to any information related to health and safety that they require, and treated, to all intents and purposes, as an employee representative as per the Safety Representatives and Safety Committees Regulations 1977 for this specific task, with a view to



Title: Health, Safety & Environmental Management

Date: 18 October 2022

Document No: XA10

Revision: 2.0

ensuring that information is available to provide a complete picture. All information requests must be justifiable and recorded in writing. This framework shall be subject to annual review and updated accordingly. It is set out as a statutory guide for the annual safety, health and environmental report and epidemiological analysis.

Amendment History

Revision No	Amendment Details	Date
1.0	Original document produced with amends as necessary to be relevant	16/11/2020
2.0	Amendments to line management, names of staff and roles and responsibilities following structural changes in the business	18/10/2022