

Policy Title:	Health & Safety Policy (in accordance with the Health & Safety at Work etc. Act 1974)
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Definitions of Terms Used:	
ACOP's	Approved Codes of Practice.
Competent Person	A person deemed by the Company to have sufficient training, experience or knowledge and other personal qualities to properly assist the Company to undertake measures required to comply with health & safety legislation.
COSHH	Control of Substances Hazardous Health.
Corrective Action	Action taken to prevent recurrence of an incident (also see Preventive Action)
DSE	Display Screen Equipment.
H&S Working Practice	Any verbal or written health & safety instruction.
H&S	Health & safety
HSE team	KCOM Group PLC's Health, Safety and Environmental Team
Health & Safety Plan	Health & Safety specific plan that supports the H&S strategy and Policy.
IMS	Integrated Management System
PAT	Portable Appliance Testing.
PPE	Personal Protective Equipment
Preventive Action	Action taken to prevent an incident occurring (also see Corrective Action)
RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences.
Safe System of Work	A formal procedure that documents how the risks identified in a risk assessment are to be controlled.

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1 POLICY STATEMENT

1.1 Scope

The Health & Safety at Work (etc) act 1974 [section 2(3)] requires all employers with more than 5 employees to provide a written statement on their general policy regarding health and safety at work and the organisation and arrangements for carrying out that Policy.

This Policy complies with the above requirement and relates to all KCOM sites and activities, and all employees, visitors and members of the public at these sites. The Policy also extends to non-Company sites / areas where employees are undertaking approved work activities, and to any activities in other countries.

This Policy forms part of the Company's overall Integrated Business Management System (IBMS), ensuring that health & safety is effectively integrated within the daily management of the Company and is continuously developed and improved.

1.2 Commitment

The KCOM Group PLC Board recognises that making effective provision for health & safety is fundamental to the well being of the entire Company, its employees and members of the public.

In order to achieve this, a Health & Safety Strategy has been agreed with the following mission statement.

“Commensurate with a successful business operation, all employees, and those affected by, or involved with our work activities will receive a safe, healthy and supportive working environment which will ensure they remain free of injury or ill health”.

Our Strategy together with this Policy, a Health & Safety Plan and all other supporting health & safety documentation and arrangements will ensure that we comply with all applicable legal requirements and contribute to the continuous improvement of our health & safety management and performance.

We believe that a pro-active health & safety culture is an important element of our success. To create this culture and to continually improve our health & safety performance we will ensure that: -

- Health & Safety is effectively **controlled** by *making sure that our employees and contractors understand their responsibilities*
- Our employees are **competent** by *assessing the skills needed to carry out tasks from a health & safety perspective and providing all employees with appropriate and adequate instruction and training.*
- **Co-operation & consultation** with us is encouraged *through the participation of employees in consultation forums, involvement in the development of our Health & Safety policy, arrangements, procedures and health & safety working practices and the undertaking of specific health & safety roles.*
- **Communication** is *clear, understandable and visible to all in relation to health & safety*
- Health & Safety arrangements and working practices are effectively **co-ordinated** across the Group *to ensure consistency and maximum effectiveness.*
- All aspects of Health & Safety are **checked** and monitored by management and the HSE team *to identify areas for improvement or non-compliances so that appropriate action can be taken.*

We recognise and will fulfil our responsibilities as an employer *under Section 2 of the Health & Safety at Work Act 1974* to ensure as far as is reasonably practicable, the health, safety and welfare of our employees.

In particular, this includes the provision and maintenance of:

- *Safe plant and equipment and safe systems of work.*
- *Safe handling, storage, maintenance and transport of articles and substances.*
- *Information, instruction, training and supervision as is necessary.*
- *A safe place of work, with safe access and egress.*
- *A safe working environment with adequate welfare facilities.*

We also recognise and will fulfil our responsibilities under *the Management of Health & Safety at Work Regulations 1999*, which support the above responsibilities and provide a framework for the effective management of health & safety.

We will monitor and wherever possible comply with government-led national strategies for health & safety including specific management standards, guidance, campaigns and enforcement-focused activities.

We will implement, monitor and report against the H&S Plan including data on the achievement of agreed performance indicators and other related objectives and targets for the relevant period.

We will commit the necessary resources as far as reasonably practicable to achieve all of the above.

1.3 Employee Behaviour

We will involve employees in the achievement of safe and healthy working conditions and in turn we expect their full co-operation and support. All employees must comply with the requirements of this Policy and all related health and safety arrangements in full and in particular we expect them to: -

- *Take reasonable care of their own health & safety and that of others.*
- *Co-operate with us to enable us to comply with our legal duties*
- *Not intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety and welfare*

Failure to comply with the above requirements will be investigated and managed in accordance with the Company's Disciplinary Policy.

1.4 Communication of Policy

A copy of this Policy and all material changes will be communicated to all employees by whatever means are needed to make sure that they have read and understood it.

This Policy and all other health & safety related documentation will be held on the Company intranet as well as other approved controlled areas.



Bill Halbert
Executive Chairman
Date 01/03/11

2 REASON FOR POLICY

This Policy is required under the Health and Safety at Work etc. Act 1974.

3 ORGANISATIONAL RESPONSIBILITIES FOR THE IMPLEMENTATION OF THE H&S POLICY

All employees have health & safety responsibilities and these must be understood in order to ensure our Policy's effective implementation. The responsibilities of various categories of people are defined in section 3.1 below. Specialist responsibilities are set out in section 3.2.

Health & Safety Planning is undertaken by key personnel (as illustrated in the diagram below) to ensure that all these responsibilities and arrangements are integrated and co-ordinated across the Group so that the overall policy is effectively implemented and achieves its desired result.

This diagram shows the responsibilities for the Policy, Health & Safety Plan and implementation together with supporting responsibilities.

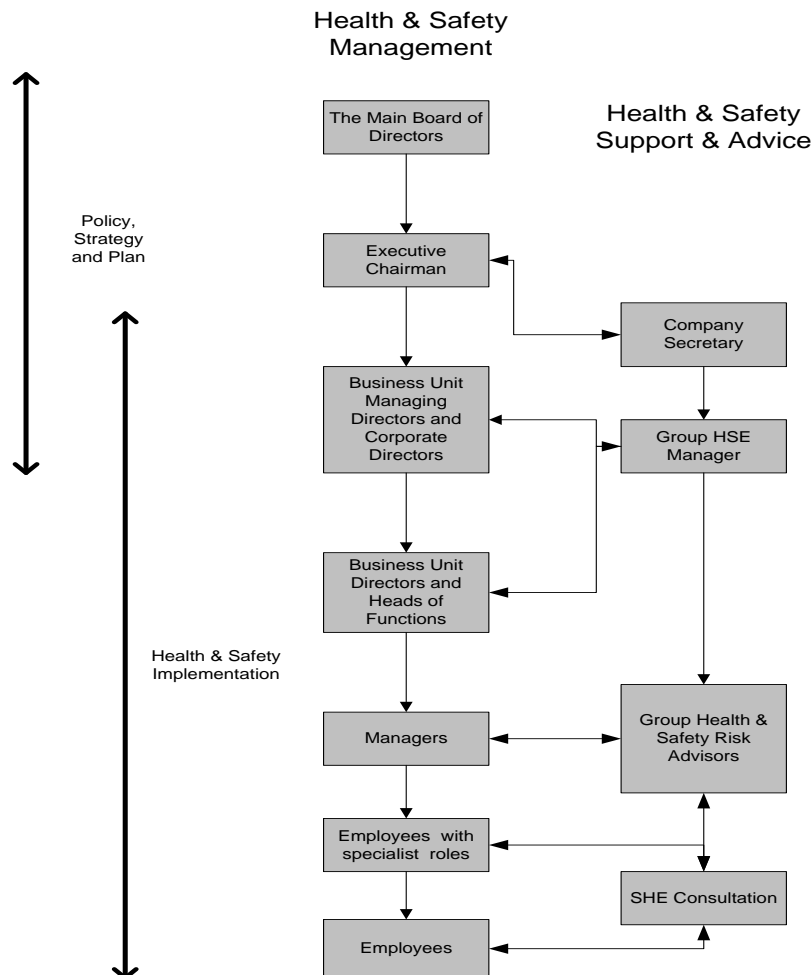


Diagram 1 – H&S Responsibilities

3.1 HEALTH & SAFETY RESPONSIBILITIES

3.1.1 The Main Board of Directors

- The Company's Board of Directors has ultimate responsibility for health & safety across the Group.
- The Board of Directors will ensure that health & safety is fully considered where relevant to Board decisions.
- The Board have delegated operational responsibility for health and safety to the Chief Financial Officer however they retain overall accountability.

3.1.2 The Executive Chairman

The Executive Chairman is responsible for:

- Delegated executive management of KCOM Group PLC's health & safety function on behalf of the Board of Directors.
- Ensuring compliance with the Company's health & safety legal responsibilities and duties.
- Ensuring that health and safety is considered within the context of all relevant board decisions.
- Ensuring that as part of the overall Health & Safety Management System, an appropriate Health & Safety Strategy, Policy and Plan are developed and approved that reflect Board priorities.
- Ensuring that the necessary resources, so far as is reasonably practicable, are made available to enable effective compliance with the H&S Strategy, Policy, Plan and other related requirements.
- Ensuring that a positive working health and safety culture is in place and remains effective.

3.1.3 Business Unit Managing Directors & Corporate Directors

Business Unit Managing Directors and Corporate Directors are responsible for:

- Providing effective leadership in health & safety and ensuring that employees understand and fulfil their responsibilities for health & safety and where necessary arrange for appropriate training.
- Providing appropriate input to the H&S Policy, Strategy and Plan.
- Ensuring that health & safety is fully considered when making decisions.
- Ensuring that appropriate budgets are prepared for their units / functions to facilitate implementation of the H&S Policy and Plan and effective overall health & safety management.
- Committing resource as far as is reasonably practicable to ensure effective health & safety management in respect of their operational areas.
- Co-operating with the Company Secretary and Group HSE Manager and ensuring the implementation of the H&S Policy, Strategy and Plan in respect of their operational areas.
- Notifying SHE&Q of any changes which may have a health & safety impact at the earliest appropriate opportunity to ensure that an effective risk assessment is undertaken prior to the introduction of such changes.
- Co-operating through the Board to facilitate co-ordinated implementation of the Company's H&S Policy and Plan.

- Ensuring health & safety issues are regularly reviewed in Management Meetings and Team Briefings.

3.1.4 Business Unit Directors and Heads of Functions

Business Unit Directors and Heads of Functions are responsible for:

- Providing effective leadership in health & safety and ensuring that managers understand and fulfil their responsibilities for health & safety, and where necessary arrange for appropriate training.
- Ensuring that health & safety is given sufficient consideration when making decisions in their areas of responsibility.
- Allocating resource as far as is reasonably practicable to ensure compliance with the H&S Strategy, Policy, Plan and other related requirements.
- Co-operating with the Director of Internal Audit and Risk Management and Group SHE Manager and ensuring effective communication, understanding and implementation of the H&S policy, plan, arrangements, procedures and health & safety working practices.
- Ensuring health & safety issues are included on the agenda of all regular management meetings / team briefings under their control.
- Releasing employees to attend necessary training and encourage participation in the development of policies, arrangements procedures, and health & safety working practices associated with work activities they undertake.

3.1.5 Managers

Managers are responsible for:

- Ensuring all employees receive health & safety induction and other appropriate training as is necessary to ensure compliance with all relevant health & safety legislation and KCOM health & safety requirements.
- Ensuring all employees receive, understand and act upon information, instruction, and supervision as is necessary in order that they can undertake their role in a safe and healthy manner.
- Ensuring that health & safety is given sufficient consideration when making decisions in their areas of responsibility.
- Identifying and managing budgetary requirements in their areas of responsibility to ensure compliance with all health & safety requirements and agreed key performance indicators as far as is reasonably practicable.
- Ensuring appropriate Risk Assessments are undertaken and that appropriate control measures including Safe Systems of Work, Method Statements etc are implemented where required and if so that they are maintained and reviewed in their areas of control.
- Ensuring documented Risk Assessments and Safe Systems of Work, Method Statements etc. are reviewed and approved where related to their areas of control.
- Ensuring that workplace and work practice inspections and checks are regularly undertaken in their areas of responsibility.

- Implementing and complying with both existing and any new health & safety specific arrangements, procedures and working practices to ensure compliance with the H&S policy , Plan and / or health & safety legislative requirements.
- Allocating tasks appropriate to the individuals' capabilities and health & safety training.
- Ensuring accidents, near misses, dangerous occurrences and hazards are appropriately reported and investigated promptly and that any corrective or preventive actions are taken as appropriate.
- Taking appropriate action to remedy unsafe equipment and / or unsafe health & safety working practices
- Ensuring that health & safety performance in their areas of responsibility is assessed, monitored and reviewed in order to continually improve on performance.
- Ensuring the any contractors under their control are effectively managing health and safety.

Non-people Managers

Non-people managers are responsible for:

- Ensuring that health & safety issues are given sufficient consideration when making decisions e.g. financial or technical, in their areas of responsibility as these decisions may have an effect on the health & safety of employees and other persons.

Supervisors / Team Leaders

- Supervisors / Team leaders may be assigned certain duties by their Manager to enable those managers to fulfil their responsibilities as identified above, however the accountability itself is not delegated.

3.1.6 Employees

Individual employees must:

- Take reasonable care of their own health & safety and that of others.
- Carry out their assigned duties and tasks in accordance with the H&S Policy, Arrangements and all other health & safety working practices, rules and instructions.
- Not interfere with or mis-use anything provided in the interests of health & safety or to do anything likely to endanger themselves or others.
- Withdraw from the immediate vicinity of any health and safety hazards that they become aware of and report the details immediately to their relevant Manager.
- Co-operate fully with their Manager or any other person on health & safety matters so far as is necessary to enable any legal duty or requirement to be performed or complied with.
- Report any known defects in equipment or systems that they believe is or may become a safety hazard.
- Report situations in which they believe there are circumstances at work that pose a serious health or safety risk.
- Report accidents, near misses, dangerous occurrences and any other hazards promptly and co-operate with any investigations.

- Not use any machinery, equipment, substance, vehicle or device other than in accordance with any instruction or training that has been provided.
- Use correctly all guards and safety devices that have been provided.
- Make full and proper use of any personal protective equipment (PPE) in accordance with the H&S Policy, Arrangements, health & safety working practices, rules and instruction.
- Familiarise themselves with the location of first aid facilities and the identity of the first aiders appointed in the relevant area.
- Familiarise themselves with the local evacuation procedure in the event of a fire or other emergency.

3.2 EMPLOYEES WITH SPECIALIST ROLES

3.2.1 Company Secretary

The Company Secretary is responsible for:

- Risk management for the Group through compliance with Financial Reporting Council Guidance and ensuring effective health & safety support and advice is provided through the HSE team.
- Ensuring that the health and safety performance of the Group is reviewed with the Board.
- Ensuring that the board is kept informed of and alerted to, relevant health and safety risk management issues including any significant failures and the outcome of the investigations in to their causes.
- Ensuring that a Health and Safety Management System is established, implemented and maintained in accordance with BS OHSAS18001:2007.
- Working with the Group HSE Manager to ensure that business unit Managing Directors and Corporate Directors:
 - (i) Understand and fulfil their health & safety responsibilities in relation to the H&S Strategy, Policy and Plan.
 - (ii) Consider health & safety when making decisions in their areas of responsibility; and
 - (iii) Implement arrangements to support the H&S Strategy, Policy and Plan with any variations required to reflect conditions specific to their businesses/functions.

3.2.2 Group HSE Manager

The Group HSE Manager is responsible for:

- The development of the overall H&S Strategy, Policy and Plan in conjunction with all relevant parties, for Board approval.
- Working with the Company Secretary to ensure that Managing Directors, Corporate Directors and Business Unit Directors:
 - (iv) Understand and fulfil their health & safety responsibilities in relation to the H&S Strategy, Policy and Plan.

- (v) Consider health & safety when making decisions in their areas of responsibility; and
 - (vi) Implement arrangements to support the H&S Strategy, Policy and Plan with any variations required to reflect conditions specific to their businesses/functions.
- Providing advice to the operating businesses and Group functions in their preparation of health & safety budgets.
 - Provide advice and support on new legislation and changes to existing legislation relating to health & safety and assessing and advising on the implications for the Group.
 - Generating progress reports for the Company Secretary highlighting implementation and progress against the Group's achievement of the H&S Plan including data on the achievement of agreed performance indicators and other related objectives and targets for the relevant period.
 - Ensuring the requirements of BS OHSAS18001:2007 are implemented and maintained.
 - Analysing the results of internal audits to ensure appropriate corrective and preventive action is implemented.
 - Providing advice and support on best practice and new techniques in relation to health & safety.
 - Providing health & safety data and advice for health & safety insurance and risk management.
 - Providing advice and support to management so that contractors are managed effectively from a health and safety perspective

3.2.3 Group Health & Safety Risk Advisors

These Advisors are responsible for:

- Providing specialist advice and support to the Group on health & safety issues.
- Providing support for the development and implementation of a programme of training in relation to health & safety legislation and obligations.
- Representing the Company with relevant enforcement authorities as may be required and providing advice and support in respect of any legal proceedings on health & safety matters.
- Assisting in the implementation of arrangements in line with the requirements of OHSAS18001.
- Assisting in management of the Company's health & safety audit programme and the preparation of audit reports.
- Undertaking general and specific risk assessments as required.
- Undertaking specialist audits and inspections of work / premises across the Group including contractors.
- Providing RIDDOR incident reports to the relevant enforcing authority.
- Providing support in respect of health & safety insurance and risk management.

3.2.4 Appointed Persons (First Aid)

Appointed persons are responsible for

- Assessing a situation where a person is injured or taken ill at work and pass on the relevant information if it is necessary to summon medical assistance and know the requirements for first aid equipment.
- Ensuring that the first aid box in their area is fully stocked and reporting deficiencies to Estates or Site Services
- Calling the emergency services if required.

3.2.5 Appointed Risk Assessors

Appointed Risk Assessors are responsible for:

- Developing new and reviewing existing general and specific risk assessments as required by law in conjunction with the HSE team and relevant management and employees.
- Involving persons with detailed knowledge of the specific tasks to be assessed.
- Carrying out risk assessments in accordance with legal requirements using Company arrangements and approved methodologies
- Identify appropriate control measures that are reasonably practicable,
- Using 'Nomograms' as appropriate to provide an objective test of reasonably practicable (Edwards Test).
- Sending completed risk assessments to the HSE team for initial approval.
- Developing safe systems of work from the risk assessment and sending them to the HSE team for initial approval.
- Participation in risk assessments as appropriate.

3.2.6 Construction Design & Management Regulations-related Roles

The Company and relevant employees may undertake any of the roles below. In some cases multiple roles may be undertaken.

These roles are:

- Client
- Designer
- CDM Co-ordinator
- Principal Contractor
- Contractor

Further information can be found on the H&S intranet site under CDM.

3.2.7 Employee Health Safety & Environmental Representatives

Employee HSE Representatives are responsible for:

- Representing employees and consulting with the Company on health & safety matters.

- Taking part in the investigation of potential hazards/dangerous occurrences in conjunction with the SHE&Q team and reporting their findings to the Company.
- Co-operating with management and the HSE team in the examination of causes of accidents at work.
- Investigating complaints by those they represent relating to health or safety at work.
- Making representations to the Company on general health & safety issues.
- Liaison with health & safety inspectors where required in conjunction with the HSE team.
- Attending HSE Consultation meetings relating to the employees they represent.
- Undertaking workplace inspections as agreed with the HSE team and report findings.
- Liaison with the HSE team to ensure information is up to date at the relevant site
- Escalation of issues to the HSE team or the relevant Regional SHE Consultation Meeting that have not been resolved.
- Supporting initiatives at regional / site level.

3.2.8 Fire Marshals

Fire Marshals are responsible for:

- Carrying out any relevant instructions given by the emergency services.
- Receiving reports from all fire wardens stating that their area of responsibility is clear of all personnel and also take note of any unusual circumstances.
- Liaison with the emergency services providing any relevant information as requested.
- Giving authorisation to Fire Wardens to notify personnel that it's safe to return to the building after receiving the all clear from the emergency services or if false alarm is proven.
- Advising new employees of fire arrangements (e.g. fire exits, location of extinguishers) where requested

3.2.9 Fire Wardens

Fire Wardens are responsible for:

- Carrying out any relevant instructions given by the emergency services.
- Ensuring their designated area is cleared and reporting to their Fire Marshal.
- Assuming the role of Fire Marshall if this person or Deputy is unavailable (see above for functions).
- Advising new employees of fire arrangements (e.g. fire exits, location of extinguishers) where requested

3.2.10 First Aiders

First Aiders are responsible for:

- Providing first aid in the event of an accident or the sudden onset of illness until medical help can be obtained.

3.2.11 Director of Group Estates and Facilities

The Director of Group Estates and Facilities is responsible for:

- Reviewing and responding as appropriate to recommendations from the HSE team in relation to all sites / projects within the Director of Group Estate's and Facilities remit.
- Notifying the HSE team of any changes which may have a health & safety impact at the earliest appropriate opportunity to ensure that an effective risk assessment is undertaken prior to the introduction of such changes.

3.2.12 Programme Managers, Project Delivery Managers / Project Managers

Programme Managers, Project Delivery Managers / Project Managers are responsible for:

- Ensuring that any hazards (actual and potential) associated with the project are designed out wherever possible, that all relevant Risk Assessments are undertaken and that agreed Method Statements / Safe Systems of Work are implemented, and that all other relevant health & safety issues are considered and subsequently managed with support from relevant Managers and the HSE Team.
- Ensuring projects comply with the requirements of the Construction Design & Management Regulations and that these requirements are included in Project Plans.

3.2.13 Health Safety & Environment Consultation Chairperson

The Chairs of HSE Consultation Meetings are responsible for:

- Ensuring that HSE meetings are held and minuted on a regular basis and that actions and time scales are agreed.
- Ensuring that minutes of meetings are passed to SHE&Q and that relevant issues are notified to SHE&Q if they are not in attendance at the meeting.

3.2.14 Internal Auditors

Internal Auditors are responsible for:

- Monitoring the effectiveness of health & safety arrangements, procedures and controls within each business unit and functional area and also relevant contractors.
- Reporting non-conformances to the Group HSE Manager.

3.2.15 Site Heads

Site Heads are responsible for:

- Acting as the senior person to whom all significant incidents and issues relating to that site are notified such as enforcement authority visits or inspections; escalation of any health & safety issues which are site specific; receipt of any bomb threats, in accordance with the arrangements for the Receipt of Bomb Threats and Warnings; and escalation of any significant breaches of company policy.

3.2.16 Union Appointed Safety Representatives

Union Safety Representatives are responsible for:

- Representing employees and consulting with the Company on health & safety matters.
- Taking part in the investigation of potential hazards/dangerous occurrences and reporting their findings to the Company.
- Co-operating with management and the HSE team in the examination of causes of accidents at work.
- Investigating complaints by those they represent relating to health or safety at work.
- Making representations to the Company on general health & safety issues.
- Participating in health & safety inspections.
- Liaison with health & safety inspectors in conjunction with the HSE team.
- Attending HSE Consultation meetings relating to the employees they represent.

4 HEALTH & SAFETY CULTURE

The following elements and associated arrangements have been implemented to ensure a proactive health & safety culture.

4.1 Control

It is important that all employees understand how health & safety roles and responsibilities are allocated between different levels of the Company in order to ensure effective control of health & safety.

Section 3.1 of this Policy together with health & safety training provided by the Company ensures that all employees understand their responsibilities.

Directors of the Company have responsibilities for providing a leadership in relation to health & safety and raising the credibility and profile of effective health & safety management within the Company.

Management at all levels of the Company are required to lead by example.

Control is also maintained through the effective management of contractors.

4.2 Co-operation & Consultation

The Company has implemented a consultation process to ensure that all employees are consulted on health & safety issues and that a forum is provided for raising health & safety issues that have not been resolved satisfactorily via existing means.

The Consultation Process allows for both Union and non-union (Employee HSE Representatives) to be consulted via Regional Consultation Meetings and provides a formal opportunity for co-operation between the Company and Unions and Employees in relation to proactive health & safety management. In certain cases the Company may also consult directly with employees.

Employees are actively encouraged to be involved in health & safety planning, reviewing performance, developing arrangements / working practices and addressing problems / issues.

See the HSE Consultation Arrangements for further details.

Where KCOM operates in buildings which are also used by other private companies then we will actively liaise with the company responsible for the management of the building lease as well as those companies working in these buildings to ensure health and safety working practices are effective and maintained.

Co-operation and consultation is also maintained with contractors.

4.3 Communication

All health & safety related documentation will be held on the Company intranet and other approved documentation repositories and, where necessary, will also be provided and distributed in paper/booklet format.

HSE notice boards at all major workplaces will also be used to display relevant information.

Internal magazines and newsletters and other relevant media will be used to communicate specific information on an ongoing basis.

HSE Consultation Meetings will be held to enable direct communication of health & safety issues.

A member of the HSE team will also attend business unit management meetings upon request in order to discuss and resolve health & safety issues e.g. new arrangements, implications of changes in legislation etc.

Effective communication will also be maintained with contractors.

4.4 Competence

A Competent Person is a person deemed by the Company to have sufficient training, (e.g. a recognised qualification, membership of a professional body), experience or knowledge and other personal qualities (e.g. a person with practical and theoretical knowledge of working within the environment to be assessed and the ability to make an assessment of the problem) to properly assist the Company to undertake measures required to comply with health & safety legislation.

The HSE team will work with management to ensure effective health and safety competence is maintained.

Contractors are also required to maintain effective competence.

4.5 Co-ordination

The HSE team will ensure that health & safety management is co-ordinated to ensure that:

- Resource is maximised.
- Policy, procedures and health & safety working practices are standardised wherever possible.
- Best practice is shared.
- Duplication of effort is avoided.

Where a site is shared with another employer/s then the Company will co-operate and co-ordinate with the employer/s to ensure that it's arrangements are effective and comply with legislative requirements in particular *the Regulatory Reform (Fire Safety) Order 2005*.

4.6 Checking, Monitoring and Feedback

Health & safety will be monitored on an ongoing basis by the management of the Company. This monitoring will focus on ensuring compliance and also on identifying areas for improvement.

SHE&Q will also undertake independent monitoring through inspections and audits including the work of contractors.

Periodic cultural surveys will also be undertaken to address issues raised by employees that present actual or potential blockages to the development of a proactive health & safety working culture.

5 IMPLEMENTATION ARRANGEMENTS – INTRODUCTION

Regulation 5 of the *Management of Health & Safety at Work Regulations 1999* requires that the Company makes, and gives effect to, arrangements as are appropriate for the effective planning, organisation, control, monitoring and review of preventive and protective measures.

This following section provides details of the arrangements that have been implemented to comply with the above and to ensure compliance with health & safety Legislation. They are divided into: -

- Management
- Hazards

Specific arrangements developed by newly acquired organisations may be retained in the short term until integration is achieved via the H&S Plan. These will be clearly identified and referenced below and will be complied with by employees of these organisations or employees working at sites relating to these organisations until instructed otherwise.

5.1 MANAGEMENT

5.1.1 Accidents, Near Misses, Dangerous Occurrences & Reportable Diseases

All Accidents and Near Misses should be reported and investigated via KCOM's H&S Incident Reporting Arrangements found on the H&S intranet.

The employees Medical Practitioner will notify Reportable Diseases to HR and the HSE team. The HSE team will report the incident to the Health and Safety Executive and ensure action is taken as appropriate.

5.1.2 Construction, Design & Management (CDM)

The Company recognises its responsibilities under the *Construction (Design & Management) Regulations 2007* and associated *Approved Codes of Practice (ACOP's)* and guidance notes, and will comply with all relevant aspects of this legislation.

Further information can be found on the HSE intranet site under CDM or by contacting the HSE team.

5.1.3 Contractor Management

Contractors are defined as companies or people (other than employees) that undertake work on behalf of the Company.

All potential new contractors must complete the CDM Competence Assessment Questionnaire. This will be used as part of the evaluation by the HSE team of that contractor's level of health & safety competence in conjunction with the relevant departments and managers.

If a Contractor's submission is approved it will be issued with the Company's Contractor Code of Practice and other documentation as appropriate that will outline the Company's requirements when undertaking work on its behalf.

Company site-specific risks will be also be communicated to the contractor as applicable.

If the submission is rejected then the Contractor will be notified by the relevant manager.

Contractors will be required to submit appropriate Risk Assessments and Safe Systems of Work in advance of the work that they are being contracted to undertake.

All contractors will sign in and out at site.

Contractors will be supervised at a level and frequency appropriate to the risk associated with the work being undertaken.

Inspections and /or audits of Contractors will be documented and corrective and / or preventive actions agreed as appropriate.

Contractor performance will be reviewed by managers in conjunction with the HSE team at intervals appropriate to the work being undertaken to ensure compliance with agreed requirements and that ongoing standards are maintained.

Contractor representative/s may be requested to attend appropriate local health & safety meetings in order to discuss/resolve relevant safety issues.

5.1.4 Customer Sites

A proportion of our employees and contract personnel work on customer sites. KCOM Health & Safety arrangements still apply in these cases however all persons working on customer sites must also be conversant with the customer's Health and Safety site rules procedures in operation at that particular site e.g. Fire procedures.

Any anomalies or issues at site should be raised with the relevant line manager.

Accidents should be recorded in the accident book at the site however they also be reported as per 4.1.1 above.

5.1.5 Documentation

All employees need to understand how to discharge their responsibilities in relation to health & safety and all documentation will be clear, visible and available in an appropriate format in order to support this objective.

All Health & safety documentation will be developed in accordance with the requirements of British Standard BS OHSAS18001 and also the requirements of the Company's Integrated Business Management System (IBMS).

All policies, arrangements, procedures and health & safety working practices will be developed in co-operation with relevant employees and employee representatives to ensure full involvement and ownership.

5.1.6 Fire & Emergency Procedures

All employees will be made aware of and required to respond to the fire evacuation procedure for their specific site. Company buildings that require the issue of a fire certificate will hold two fire drills annually.

An audible test for the fire alarms in all buildings requiring a fire certificate will be carried out week in offices and monthly / quarterly in engineering sites.

The fire actions to be observed by company employees are detailed in the Fire Procedures for each site that will be made available to all employees at the relevant site and included in induction training.

Procedures will also be available on the found on the HSE Intranet site. Fire directional signage will also be displayed at each location indicating the actions to be taken.

Adequate numbers of staff will be trained to carry out set duties in the event of an evacuation. All fire marshals and wardens will be trained in the safe use of fire fighting equipment.

Adequate and appropriate fire fighting equipment will be provided and maintained in accordance with legal requirements.

In the event of a bomb threat, buildings will be cleared **without** the use of the fire alarm.

Other emergency situations will be indicated by the use of the fire alarm.

Employees working on customer premises will appraise themselves of local procedures and comply with them when required.

5.1.7 First Aid

The Company recognises its responsibilities under the Health & Safety (*First Aid*) Regulations 1981 (and associated Approved Codes of Practice (ACOP's) and guidance notes) as amended by the Health & Safety (*Miscellaneous Amendments*) Regulations 2002.

First Aiders and first aid kits are available at all sites and details of first aiders can be found on the H&S intranet site and also via the KCOM central switchboard.

When in doubt and in the case of medical emergencies then the emergency services should be contacted via 999 and an ambulance requested.

5.1.8 Housekeeping

All employees are responsible for ensuring that the area they work in is kept tidy and free from unnecessary clutter.

Floor areas and corridors should be kept free from obstruction at all times.

Waste must not be left to accumulate and should be disposed of using the facilities provided.

Should an employee identify a health and safety hazard e.g. damaged equipment, then they should report it immediately to their line manager who will ensure that the issue is resolved through the appropriate channels.

Building related issues can be reported directly to the Estates Helpdesk.

5.1.9 Homeworking

All Primary, Home-based and Occasional Homeworkers will be contacted by the HSE team and an assessment undertaken of their home environment to ensure that any hazards associated with their chosen work area are identified and effectively controlled.

These will be undertaken initially via a phone call initially and either a Primary Homeworker Checklist or a Home-based / Occasional Homeworker completed as appropriate.

A home visit may be required if deemed appropriate by the HSE team either to ensure specific measures are addressed or to check that agreed controls have been implemented.

See KCOM's Homeworking Policy for further details or where applicable follow Business Unit specific Policy or arrangements.

5.1.10 Information

The Company will provide clear and relevant information to all employees and on:

- Risks to their health, safety & welfare
- Control measures.
- Emergency procedures.
- Procedures for serious and imminent danger and for danger areas.
- The identity of competent persons with regards to emergency procedures and dangerous situations.

The Health & Safety Policy and the Health & Safety Law Poster is also displayed at KCOM sites and is also on the H&S intranet site and other approved controlled areas.

Contractors will be provided with relevant H&S information.

5.1.11 Inspections of the Workplace

Managers are responsible for ensuring regular inspections are undertaken of the areas that they are responsible for and the areas that their employees work in.

Office sites will also be inspected prior to HSE consultation meetings taking place.

Engineering sites will be inspected by the nominated engineer through the agreed process.

Independent inspections and audits will also undertaken by the HSE team

5.1.12 Investigation of Health & Safety Incidents

Any reported health & safety incidents involving employees, contractors or subcontractors whether on a Company site or on a customer site will be investigated by the relevant Manager and / or the HSE team in conjunction with the relevant Union personnel as appropriate. This will be triggered through the H&S Incident Reporting Arrangements.

5.1.13 Management Systems

All health & safety related documentation will comply with the requirements of BS OHSAS18001:2007 and will integrate with existing processes and procedures wherever possible and the overall Integrated Business Management System (IBMS)

5.1.14 Occupational Health

The Company strategy for Occupational Health is focused on preventative occupational health intervention. This strategy is aligned with one of the six national priorities for local authority regulatory enforcement which is "improving health in the workplace".

Our Occupational Health management is undertaken through a co-ordinated approach between the HSE team, HR, Line Management, Firstcare and other appropriate consultants / service providers. The following areas are covered under the company's overall Occupational Health Management:

5.1.14.1 Access to Occupational Health

Employees requiring access to Occupational Health Services should contact their line manager in the first instance. These services are provided through a co-ordinated approach between HR, the HSE team and Firstcare.

5.1.14.2 Well being, Health Promotion & Campaigns

The HSE team will run regular health promotion and campaigns which will support key occupational health issues and raise awareness of the company's arrangements and details of

support that can be provided by both the Company and other external organisations. Where possible this complement government led campaigns through the Health and Safety Executive.

See KCOM's Wellbeing Arrangements for further details.

5.1.14.3 New and Expectant Mothers

The Company recognises its responsibilities under the *Management of Health & Safety at Work Regulations 1999* (and associated ACOP's and guidance notes) as amended by the *Health & Safety (Miscellaneous Amendments) Regulations 2002*

The Company will undertake a Risk Assessment when notification is received that the employee is a new or expectant mother.

This risk assessment will be undertaken initially by a member of the HSE team or by an HSE team designated competent risk assessor however wherever possible the Manager of the new or expectant mother is responsible for ongoing reviews with support from the HSE team and for ensuring that any issues raised are addressed in conjunction with the assessor.

This risk assessment will determine whether the work undertaken could involve risk to the health & safety of a new or expectant mother, or to that of her baby, from any Arrangements or working conditions, or physical, biological or chemical agents.

The Company will introduce measures to reduce the risks as far as is reasonably practicable.

If normal control measures will not protect the new or expectant mother from such risks then the Company may alter her working conditions or hours of work. If these options are not reasonable or they would not avoid the risk, the Company will suspend the employee from work for as long as necessary on full pay.

5.1.14.4 Health Surveillance

Health Surveillance will be undertaken where required enabling the Company to systematically monitor and identify early signs of work-related ill health in employees exposed to certain health risks.

Risk assessment will be the method by which the potential requirement for health surveillance is identified.

5.1.15 Performance Monitoring & Reporting

Overall Health & Safety performance is monitored and reported to the Board on a quarterly basis. Performance is measured against a number of objectives and targets that are agreed in the yearly Health & Safety Plan.

An overall summary is also reported in the CSR (Corporate Social Responsibility) section of the Company's Annual Report and Accounts.

Performance at an operational level is also monitored by the HSE team against specific plans agreed with relevant departments / functions within the Group.

5.1.16 Personal Protective Equipment (P.P.E)

The Company recognises its responsibilities under the Personal Protective Equipment at Work Regulations 1992 (and associated ACOP's and guidance notes) as amended by the Health & Safety (Miscellaneous Amendments) Regulations 2002

PPE will be provided as a last resort where other measures can not control the risk at source.

5.1.17 Resources

The Company will allocate appropriate time and resources to achieving the effective control and management of health & safety.

Appropriate budgets will be agreed and allocated as outlined in section 2.1.

Finance and resource in order to implement health & safety control measures will be provided on the basis of "as far as is reasonably practicable" i.e. If the cost outweighs the level of risk then it is not deemed to be "as far as is reasonably practicable".

The HSE team will utilise and make available a suitable methodology for determining whether a control measure is cost effective. Where a requirement is to be provided "where practicable" then the HSE team will advise the Company.

5.1.18 Risk Assessments

The Company will ensure that risk assessments are undertaken as required by applicable health & safety legislation, to identify project / task / area related hazards, and then evaluate the risk so that appropriate control measures such as Safe Systems of Work can be implemented that are both appropriate and cost effective.

See H&S Hazard Identification & Risk Assessment Arrangements on the HSE intranet for further details.

5.1.19 Safety Signs & Signals

The Company will provide and maintain safety signs following risk assessment. The purpose of these signs is to warn or instruct employees where significant risk cannot otherwise be reduced.

Employees will be given suitable and sufficient instruction and training relating to the meaning of signs including signalling systems and what to do about them.

Signs will comply with *Schedule 1 of the Health & Safety (Safety Signs and Signals) Regulations 1996*.

5.1.20 Temporary Workers

Prior to employing any person on a fixed term contract, the manager will provide information to the worker and also their employment agency (if used) on:

- Any special qualification or skills required to carry out their work safely and without risk to health.
- Any health surveillance required

5.1.21 Training and Capability

All health & safety training required as an element of competency and / or to satisfy a legal requirement will be provided.

5.1.21.1 Allocation of tasks

Managers will take account of an employees' capability and their competence when tasks are allocated to them.

5.1.21.2 Provision of Induction Training

All new employees will receive health & safety induction training that explains:

- The health & safety responsibilities associated with their position and role within the Company
- Any specific hazards and controls required in relation to their role
- Specific health & safety information and arrangements relevant to their position
- Emergency information such as the location of fire exits, first aid kits etc.

5.1.21.3 Provision of Specific H&S Training

As part of the induction and annual appraisal arrangements, the requirements for health & safety related training of all new and existing employees must be assessed by their Manager.

Where an individual is exposed to new or increased risks then their Manager will be responsible for ensuring that they receive appropriate health & safety training, including when they are:-

- being transferred or promoted in to a new position.
- on the introduction of new work equipment or a change of use of existing work equipment.
- on the introduction of new technology.
- on the introduction of a new system of work or a change in an existing system or work.
- on changes in personal circumstances – illness or disability.

The HSE team will also identify training needs as a result of changes in legislation and these needs will be communicated to appropriate Managers.

5.1.21.4 Provision of Health & safety Refresher Training

Health & safety refresher training will be monitored through KCOM's 'My Learning' facility to ensure that it is provided when required.

5.1.21.5 Health & safety Training Records

Health & safety training records will be managed through KCOM's 'My Learning' facility.

5.1.22 Tenants (Third party occupiers of Company premises)

Tenants will be 'vetted' and a Tenants Information Pack supplied. They will be provided with a site safety induction. The Company will undertake Fire risk assessments for the tenant buildings and co-ordinate fire and emergency procedures.

5.1.23 Visitors

The Company will ensure that all reasonable measures are taken to safeguard visitors from risks to their health & safety and that they are made aware of those health & safety provisions which may affect them e.g. procedures to be followed in emergencies and equipment (including Personal Protective Equipment for use in high risk areas).

In the event of an emergency situation, visitors will be in the care of their Company hosts who must direct them to a place of safety.

5.1.24 Welfare Facilities

All KCOM locations are provided with appropriate welfare facilities as required in the Workplace (Health, Safety & Welfare) Regulations 1992.

Where KCOM employees are based on customer sites then they will utilise the welfare facilities provided by the customer unless this is prohibited in which case specific arrangements will be implemented by KCOM.

5.1.25 Young Persons

The Company recognises that it has additional responsibilities for young persons.

See KCOM's Young Person Arrangements further details.

5.2 ARRANGEMENTS – HAZARDS

5.2.1 Asbestos

The Company recognises its responsibilities under the *Control of Asbestos at Work Regulations 2006* and associated Approved Codes of Practice (ACOP's) and guidance notes.

The Company will:

- Take reasonable steps to locate materials likely to contain asbestos
- Assume that any material contains asbestos unless there is evidence that it does not
- Keep an up-to date written record of the location of these materials
- Monitor the condition of these materials
- Assess the risk of exposure from asbestos and presumed asbestos materials
- Prepare and implement a management plan to control these

All employees undertaking work at customer premises will review the site's Asbestos Register to identify where asbestos may be located before work commences.

Where there is any doubt then the employee should stop work immediately and contact their Manager.

Employees working at a KCOM site should stop work immediately and contact their Manager in the first instance if they are in any doubt as to the possible presence of asbestos.

Collection and disposal of asbestos will be co-ordinated by the HSE team using a suitably registered contractor.

See KCOM's Asbestos Arrangements for further details.

5.2.2 Confined Space

The Company recognises its responsibilities under the requirements of the *Confined Spaces Regulations 1997* and associated Approved Codes of Practice (ACOP's) and guidance notes.

Under these regulations a Confined Space is defined as a confined space both in terms of the hazard it presents and its structure. The definition in reg. 1(2) is:

"Any place including any chamber, tank, vat, silo, pit, trench, pipe, sewer, flue well or similar space in which by virtue of its enclosed nature, there arises a reasonably foreseeable risk'."

See KCOM's Confined Space Classification and Arrangements for further details.

5.2.3 Control of Substances Hazardous to Health (COSHH)

The Company recognises its responsibilities under the *Control of Substances Hazardous to Health Regulations 2002* and associated Approved Codes of Practice (ACOP's) and guidance notes.

The Company will ensure a risk assessment based is undertaken of the risks to health arising from activities that are associated with hazardous substances. This assessment will utilise information on the Material Data Sheet as well as take account of the quantity, location, people etc. that are using the substance.

Following this assessment the Company will ensure the:

- Introduction of appropriate and adequate controls (following the hierarchy of control)

- Production, update and maintenance of a hazardous substance and material inventory
- Maintenance of the controls and equipment associated with them
- Monitoring of the effectiveness of the controls and the health of employees through health surveillance where necessary

5.2.4 Excavation Work

Excavation work is a significant hazard and the Company will ensure that all employees who undertake this activity receive specific instruction and training and have the appropriate facilities made available and that appropriate inspections are undertaken at defined intervals.

5.2.5 Display Screen Equipment (DSE)

The Company recognises its responsibilities under the *Display Screen Equipment Regulations* (and associated ACOP's and guidance notes) as amended by the Health & Safety (*Miscellaneous Amendments*) Regulations 2002.

DSE assessments are undertaken through the use of DSEasy which is administered by the HSE team.

5.2.6 Electrical Work & Equipment

The Company recognises its responsibilities under *the Electricity at Work Regulations 1989* (and associated ACOP's and guidance notes) and will ensure that all electrical work undertaken complies with these requirements.

KCOM employees will only undertake low risk electrical work and the Company will provide appropriate training to allow them to do this.

All other electrical work will be undertaken by competent and specialist electrical contractors.

Arrangements have been made to ensure Portable Appliance Testing takes place at all sites.

5.2.7 Harassment / Bullying

The Company values the contribution of all its employees and has a duty to provide a working environment, in which every individual can realise his or her own potential, free from harassment. It will positively discourage any attempt to undermine this right.

See KCOM's Harassment Policy for further details or where applicable follow Business Unit specific Policy or arrangements.

5.2.8 Highways Working

There are specific hazards associated with work undertaken on the highway and the Company will ensure that all employees undertaking work of this kind receive specific instruction and training to enable them to undertake this work safely.

All employees who work in the highway must complete Unit 002 Signing, Lighting and Guarding section of The New Road and Street Works Act and be in possession of a current certificate.

A copy of the book '*Safety at Street Works and Road Works – A Code of Practice*' will be issued to all trained employees and supervisors.

The manager responsible for persons working on the highway will ensure that any additional requirements relating to specific local authorities are understood, implemented and adhered to.

5.2.9 Inert Gas Fire Suppression Systems

These systems exist on certain sites and the Company recognises that employees exposed to these systems need to understand the issues associated with them and the appropriate methods of working.

See KCOM's Inert Gas Fire Suppression Systems Arrangements for further details.

5.2.10 Legionnaires Disease

The Company's Estates Department have undertaken a risk assessment and have implemented appropriate control measures including regular maintenance and testing of relevant facilities.

5.2.11 Lifting and Handling

The Company recognises its responsibilities under the *Manual Handling Operations Regulations 1992* (and associated ACOP's and guidance notes) as amended by the Health & Safety (*Miscellaneous Amendments*) *Regulations 2002*

The Company will so far as is reasonably practicable, avoid the need for employees to carry out manual handling operations that involve a risk of injury.

Where this cannot be achieved then the Company will undertake a risk assessment and take appropriate steps to reduce risk to the lowest level reasonably practicable. The Company will also provide appropriate information.

All employees will be provided with basic training in relation to safe lifting and handling techniques.

See KCOM's Manual Handling Arrangements for further details.

5.2.12 Lone Working

Lone Working is recognised as a potential hazard that needs to be effectively managed.

In the event that Lone Working is identified then the Manager responsible will ensure a risk assessment is undertaken and appropriate control measures implemented.

See KCOM's Lone Working Arrangements for further details.

5.2.13 Needlesticks

The Company recognises that its employees may be exposed to needlesticks under certain circumstances and that employees need to understand the measures that need to be taken to avoid injury.

See KCOM's Needlesticks Arrangements for further details.

5.2.14 Noise

The Company recognises its responsibilities under the *Noise at Work Regulations 2005* (and associated ACOP's and guidance notes).

The Company will reduce the risk of hearing damage to the lowest level that is reasonably practicable.

5.2.15 Optical Fibre

The Company recognises the risks of working with optical fibre and will ensure that specific training is provided and that appropriate eye tests are also undertaken.

5.2.16 Overseas Travel

In certain instances Company employees are required to travel and work overseas and the Company recognises it has the same legal responsibilities as in the UK to ensure the safety, health and welfare of these employees.

Procedures will be implemented to ensure that these employees travel with awareness and as safely as practicably possible whilst at the same time ensuring that individual rights are maintained.

5.2.17 Portable and transportable electrical equipment

All users of the above are required to undertake a frequent visual inspection of the equipment.

See the Visual Checking of Electrical Equipment Guidance document for further details.

The Company will also ensure that a competent person subjects this equipment to a formal inspection (PAT) and that equipment is suitably labelled to indicate it's status and a database maintained.

Employees will not bring their own equipment on to Company premises unless authorised by their Manager who will be responsible for ensuring the equipment is formally tested.

5.2.18 Safe Driving & Workplace Transport and Travel

Many employees are required to drive company vehicles in order to carry out their jobs effectively and the Company takes a proactive role in the management of risk associated with this activity.

The Motor Risk Forum is responsible for ensuring that this area is managed strategically.

All employees will be provided with basic awareness training in relation to driving safely through the SHE E-learning.

Specific training will also be provided to employees that are considered to be a higher than normal risk.

See KCOM's Motor Risk Arrangements for further details.

5.2.19 Slips, Trips and Falls

The Company recognises that slips, trips and falls are a significant cause of many accidents in the workplace generally.

Formal inspections are undertaken at our sites to identify actual and potential causes of slips, trips and falls. All employees however are also required to take responsibility for their own safety and that of others and ensure that the common causes of these types of incident are managed e.g. avoid trip hazards through trailing leads, report lights that are not working, report slips hazards e.g. spilt liquids etc.

All employees will be provided with general awareness training to avoid slips, trips and falls.

5.2.20 Smoking

Smoking is not permitted in any of the Company's buildings.

Designated 'smoking areas' have been allocated on the outside of buildings.

This prohibition includes lifts, corridors, toilets, locker rooms, meeting rooms, rest rooms, dining rooms and workshops etc

NHS services are available to provide support and assistance to employees that wish to give up smoking. The SHE&Q team will provide details as requested.

See KCOM's Smoking Arrangements for further details

5.2.21 Substance Misuse

Employees are expected to report to work in a condition fit to perform their duties. Employees must not report to work under the influence of alcohol, drugs or other controlled substances.

If an employee is taking drugs for medical reason that may impair his/her performance he/she must inform their line manager.

The Company recognises that substance misuse may impact not only on an employee's own personal welfare but also may affect the safety and health of others.

The Company will aim to:

- Increase awareness and knowledge of the effects of substance misuse and their associated risks.
- Provide appropriate support for employees who suffer from substance misuse.
- Eliminate the risks to employees caused by substance misuse.

See KCOM's Substance Misuse Support Policy for further details or where applicable follow any Business Unit specific Policy or arrangements

5.2.22 Violence at Work

The purpose of the policy is to provide guidance to employees who may come into contact with potentially violent situations e.g. angry and/or abusive customers.

See KCOM's Violence At Work Arrangements for further details.

5.2.23 Working at height

Working at height is a significant hazard and the Company recognises its responsibilities under the *Working at Regulations 2005* to ensure:

- all work at height is properly planned and organised;
- those involved in work at height are competent;
- the risks from work at height are assessed and appropriate work equipment is selected and used;
- the risks from fragile surfaces are properly controlled; and
- equipment for work at height is properly inspected and maintained

The Company will provide the appropriate equipment and training to all employees required to work at height as part of their normal work activities.

General awareness training will also be provided to all employees.

5.2.24 Work Equipment / Plant

The Company recognises its responsibilities under the *Provision and Use of Work Equipment Regulations 1998* (and associated ACOP's and guidance notes) as amended by the Health & Safety *(Miscellaneous Amendments) Regulations 2002*.

All new equipment introduced in to the workplace will be assessed by the appropriate manager in conjunction with the HSE team to ensure that the equipment is suitable for it's intended use.

Equipment / Plant will only be operated by trained employees.

No employee will knowingly misuse work equipment or remove any guards that are in place to minimise a specified risk.

Equipment / Plant will be compliant with the requirements of PUWER & LOLER and will be inspected appropriately by competent persons either internally or externally against manufacturer's guidance and industry best practice.

Appropriate records will be maintained for all relevant inspections.

Defective equipment / plant must not be used and should be reported to the relevant line manager / relevant department immediately.

The equipment / plant will be identified as defective and segregated to prevent it being used until the defect is corrected.

6 SANCTIONS

Failure to comply with this Policy will be investigated and managed in accordance with the Company's Disciplinary Policy.

7 CONTACTS

The Group HSE Manager should be contacted in relation to this Policy.

8 REVIEW ARRANGEMENTS

The Group HSE Manager will review the Policy at least annually, or sooner if significant changes occur.